

First AlixPartners Investigation Report

Independent investigation of specific topics and questions raised by the SWC related to the Second World War era

March 31, 2023

AlixPartners

Privileged and Confidential

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Swiss law and our confidentiality obligations require us to report on our findings in an anonymous manner (i.e., not identifying Bank client names or Account information).¹ This Report adheres to this standard and all relevant documents that include Bank client-identifying facts are available at Credit Suisse in Switzerland.

¹ Article 47 of the Swiss Federal Act on Banks and Savings Banks (Banking Act).

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Glossary

Account	Banking Relationship maintained at a Credit Suisse predecessor entity.
ANOME Archive	Credit Suisse archive of physical files related to numbered and pseudonym Accounts closed before 1987.
APN (Archive Plan Number)	The identifier for the location of a (set of) documents in the Bank's archives.
Archive Research Requests	Follow-up requests placed with Credit Suisse's archive expert to conduct broad follow-up searches within the Bank's archives.
Argentine Lists	The UAG and Argentine NSDAP Lists.
Argentine NSDAP List	List of member names of the Argentine branch of the German Nationalist Socialist Party/Foreign Organization.
Arthur Andersen	Accounting firm retained by the Independent Committee of Eminent Persons (ICEP) in the 1990s to conduct an investigation of Accounts at Credit Suisse for victims of Nazi persecution.
Arthur Andersen Archive	The physical archive and electronic files of the investigation conducted by Arthur Andersen on behalf of the ICEP in the 1990s.
Arthur Andersen Database	The database created by Arthur Andersen with Bank client records it had collected during the centralization process in the 1990s.
Automated Application of Exclusion Criteria	Component of the review process designed to filter out obvious false positive Documents based on objective criteria.
Automated Protection Mechanism	Special automated mechanism established to prevent the automated exclusion of potentially relevant information from review.
Bank Person	Client of a Credit Suisse or Credit Suisse predecessor entity.
Bank Person File	An electronic dossier created during Second-Level Review for consolidation of Documents related to a Bank Person.
Banking Relationship	Account documented at a Credit Suisse predecessor entity.
Bergier Commission	Commission of historians, also known as "Independent Commission of Experts", established by the Swiss government in 1996 to investigate assets moved to Switzerland before, during, and after the Second World War.
Case Binder	Comprehensive Search Person-specific file in presentation format containing the identified Documents and review observations.
CCA (Central Corporate Archive)	Centrally managed physical and electronic archive for Group-relevant Credit Suisse documents.
CIF (Client Information File)	Unique number for a client relationship booked on the Credit Suisse Swiss Banking IT Platform (SBIP).
CIF Host	Electronic application for client master data on the Credit Suisse Swiss Banking IT Platform (SBIP).
Data Pool	Electronic repository of SAMatching used for the Name Matching process.
Document	Unique Document reference in the Review Platform created based on Name Matching results with metadata and available image file.
ELAR	Credit Suisse's Swiss "Electronic Records Archive" which was introduced in 1991 as the electronic archiving tool for the Credit Suisse mainframe.
Exclusion Criteria	Set of pre-defined Bank client and Account-specific criteria to identify false positive Documents.
Fact Summaries	Summaries of observations for Search Persons where sufficient plausible facts for a Banking Relationship were identified.
First-Level Review	Manual review step performed on Document content level in the Review Platform.
Fuzzy Name Search Algorithms	Technology that identifies similar, but not identical elements (in this case names) in data table sets.
Hit	Reference data record provided by SAMatching for a Name Matching hit.
Identical Name Match	Hit with identical first and last name of the Bank Person and Search Person.
Identity Investigation	Manual review and further investigation of Bank Person Files in the Review Platform to define the Search Person categorization.
Individuals of Interest	Individuals with political, commercial, industrial, military, or financial influence tied to Argentina and the NS regime, identified by public research.

Investigation	AlixPartners' independent investigation of specific topics and questions raised by the SWC related to the era of the Second World War.
Investigation Methodology	Forensic methodology designed by AlixPartners to create comprehensive, robust processes and reproducible results for the Investigation.
Investigation Server	Dedicated virtual server in the Investigation Workspace for creation and documentation of AlixPartners' work products for the Investigation.
Investigation Workspace	Secure technical infrastructure on Credit Suisse premises where AlixPartners conducted the Investigation.
Image Archive (FileNet)	Credit Suisse tool that contains the scanned documents related to the metadata from ELAR and selected scanned documents from the CCA or PRA.
Manual Review of Name Combinations	Manual review step to exclude obvious false positive Bank Person names compared to respective Search Person names in the Review Platform.
Name Lists	Electronic lists of names generated based on the Argentine Lists and SWC List for the Investigation.
Name Matching	The (Name Matching) process performed in SAMatching to identify Hits for Search Persons across relevant Data Pools.
Name Similarity	Hit with similar, not identical, first and last name of the Bank Person and Search Person.
Name Variants	Variations of the names on the Name Lists created by AlixPartners and used for Name Matching to account for maiden names, Spanish name equivalents and spelling mistakes, among others.
NS	National Socialist
NS Period	The NS Period is defined as 1933 to 1945 for the purpose of this Report.
OCR (Optical Character Recognition)	Technology to convert electronic images of typed, handwritten or printed text into machine-encoded text files.
plausible facts	Typical patterns for plausible facts are described in Chapter 5.7.
Post-War Period	Period after 1945.
PRA (Physical Records Archive)	Centrally managed physical and electronic archive storing business and client-related documents for the statutory retention periods and legal holds.
Press Release	Press release published by the SWC on March 2, 2020, titled "Wiesenthal Centre Reveals 12,000 Names of Nazis in Argentina, Many of Whom Apparently Had Accounts Transferred to Credit Suisse."
Prof. Jung	Professor Dr. phil. Joseph Jung, a historian employed by Credit Suisse who conducted historical research on behalf of the Bank, among others in the 1990s in the context of the SWC List.
Review Approach	Multi-step review to determine whether sufficient plausible facts for a Banking Relationship can be identified for a specific Search Person.
Review Platform	Electronic document and data review platform based on the software Relativity.
SAMatching	Proprietary search tool of Credit Suisse used to conduct Name Matching and searching across relevant Data Pools.
Search Person	Individual mentioned on a Name List.
Second-Level Review	Manual review step performed on all Documents identified by the First-Level Review to create Bank Person Files in the Review Platform.
SKA	Schweizerische Kreditanstalt.
Special Commission	Special commission set up in 1941 by the Argentine parliament to investigate German organizations in Argentina.
SWC	Simon Wiesenthal Center.
SWC List	List of names of "senior Nazi officials" provided by the SWC in February 1997 to the Swiss government and the Swiss Bankers Association.
SWC Person	Individual on the SWC List.
Transfer Folders	Dedicated folders within a secure transfer area used for import and export of documents, data and information between Credit Suisse and the Investigation Workspace.
UAG	Unión Alemana de Gremios (German Union of Syndicates in Argentina).
UAG Person	Individual on the UAG List.
UAG List	List of names of members of the UAG in 1941 that is contained in the Special Commission Report Informe N° 5, Noviembre 28 de 1941.

Executive Summary

- (1) Credit Suisse, through its external counsel Homburger, retained AlixPartners pursuant to an engagement letter dated December 3, 2020, to investigate independently specific topics and questions that the Simon Wiesenthal Center ("**SWC**") raised in connection with events from the Second World War era ("**Investigation**"). Our Investigation covered the three points described below:
- (2) First, on March 2, 2020, the SWC published a press release ("**Press Release**") titled "*Wiesenthal Centre Reveals 12,000 Names of Nazis in Argentina, Many of Whom Apparently Had Accounts Transferred to Credit Suisse*".² SWC simultaneously shared the same concerns in a letter with Credit Suisse. According to the Press Release, an Argentine investigator had found a list containing the names of 12,000 "[...] supporting members of the cover-up 'Unión Alemana de Gremios' (German Union of Syndicates) [...]" ("**UAG**", the list being the "**UAG List**", and individuals named on the UAG List being "**UAG Persons**"). The SWC wrote that it had "[...] a copy of the list of Nazis based in Argentina, among whom [are] several account holders of funds that were sent to Schweizerische Kreditanstalt [...]" and that "[...] many [of whom] contributed to one or more bank accounts at Schweizerische Kreditanstalt [...]", one of the predecessor banks to Credit Suisse. It also wrote they believed it "[...] very probable that these dormant accounts hold monies looted from Jewish victims [...]". Further, the Press Release referenced a list with "[...] an official figure of 1,400 members of the NSDAP/AO (the German National Socialist Party / Foreign Organization), based in Argentina [...]" ("**Argentine NSDAP**", the list being the "**Argentine NSDAP List**", and individuals named on the Argentine NSDAP List being "**Argentine NSDAP Persons**". The UAG List and Argentine NSDAP List together being the "**Argentine Lists**" and the individuals named on the Argentine Lists being "**Argentine Lists Persons**").
- (3) To have "*contributed to*" a bank account or banking relationship ("**Account**" and "**Banking Relationship**" are used as synonyms), as stated by the SWC, one either had to transfer assets to an Account that was held by a third party or to an Account held in the name of the individual that made the transfer. For the Second World War era and many years thereafter, it is generally not possible to find information for individuals that contributed to Accounts of third parties if they were not the named account holder, because (i) the transactional records and account statements contained only limited information on the originator of inbound payments; (ii) limited transactional records and account statements from that time survived; and (iii) regulations that require the identification of an account's beneficial owners were first introduced in 1977.³

² Simon Wiesenthal Center, *Wiesenthal Centre Reveals 12,000 Names of Nazis in Argentina, Many of Whom Apparently Had Accounts Transferred to Credit Suisse*, March 2, 2020, <https://www.wiesenthal.com/about/news/wiesenthal-center-argentina-nazi.html>, (last accessed on February 28, 2023).

³ The Bergier Commission explained that it is not feasible to attempt to identify intermediaries for accounts from the NS Period. As the Bergier Commission wrote, there are too many unknowns, there is no satisfactory list of beneficial owners, and the few recorded connections are of little informative value because few additional documents survive that shed light on the transactions. See Uhlig, Christiane / Barthelmeß, Petra et al. (eds.): *Tarnung, Transfer, Transit. Die Schweiz als*

- (4) Based on this, Credit Suisse decided to focus the investigation on whether plausible facts could be identified that the Bank maintained Banking Relationships for Argentine Lists Persons.
- (5) The Press Release also states that there were "[...] an additional 8,000 [individuals] affiliated to other Nazi organizations. These included such German companies as IG Farben [...] and financial bodies such as the 'Banco Alemán Transatlántico' and the 'Banco Germánico de América de Sur'". Based on our research and additional information provided by Credit Suisse, we have not been able to identify a reliable source for the "additional 8,000 individuals" associated with this statement and, accordingly, we did not further investigate this topic.
- (6) In December 2020, we were engaged to investigate independently whether the Schweizerische Kreditanstalt ("**SKA**") maintained Accounts with the 12,000 supporting members of the UAG or the Argentine NSDAP as referenced in the Press Release, and for all responsive Accounts, whether additional information on the nature, content, size and other features of these Accounts could be identified.⁴
- (7) We defined the Investigation approach and determined with input from the Bank and Homburger which data and document repositories were relevant for the Investigation. The Bank provided us with sufficient budget, a secure physical and technical working environment, and access to necessary IT and Bank archive resources to perform our work effectively.
- (8) Second, in February 1997, the SWC asked the Swiss government and the Swiss Bankers Association to ascertain whether Swiss banks maintained, or previously maintained, Accounts for certain "senior Nazi officials" on a list provided by the SWC ("**SWC List**").⁵
- (9) The SWC List contains 334 entries, relating to 311 names of prominent NS regime members, industrialists, and bankers ("**SWC Persons**") who, according to the SWC, "had the ability and who may have opened accounts in Switzerland".⁶ In the late 1990s, Credit Suisse commissioned the historian Prof. Dr. phil. Joseph Jung ("**Prof. Jung**") to research the SWC List and other concerns relating to the NS period. The results of Prof. Jung's historical research are documented in the Bank's archive and the results were published in his book in 2001.⁷
- (10) We also considered the additional relevant results of the investigations conducted by the Independent Committee of Eminent Persons ("**ICEP**"), also known as the Volcker Committee after its Chairman Paul A. Volcker, and the research of the Independent Commission of Experts, also known as the "**Bergier Commission**". In 1996, the Swiss government formed the Bergier

Drehscheibe verdeckter deutscher Operationen (1939-1952), Zurich 2001 (Publications of the Independent Commission of Experts Switzerland (ICE) – Second World War, ICE, vol. 9), page 153.

⁴ The initial scope of the engagement was to investigate the UAG List. The expanded scope of work to investigate the Argentine NSDAP List was signed on December 1, 2021.

⁵ Letter from SWC to Arnold Koller, February 1, 1997.

⁶ Letter from SWC to Arnold Koller, February 1, 1997.

⁷ Prof. Dr. Joseph Jung, Zwischen Bundeshaus und Paradeplatz – Die Banken der Credit Suisse Group im Zweiten Weltkrieg, Neue Züricher Zeitung Publishing, 2001; Prof. Dr. Joseph Jung, Credit Suisse Group Banks in the Second World War: A Critical Review, Neue Züricher Zeitung Publishing, 2002.

Commission to investigate, among other things, the volume and fate of assets moved to Switzerland before, during, and immediately after the Second World War. The Bergier Commission had access to bank archives, including those of Credit Suisse. Between 1997 and 2002, the Bergier Commission published a final report and 25 studies.⁸

- (11) The Bank asked us to independently assess the accuracy and completeness of Prof. Jung's historical research of the SWC List, and to review any newly identified Account information related to the period 1933 to 1950 at Credit Suisse's predecessor banks in Switzerland ("**SWC List Assessment**").
- (12) Third, we were asked to perform a forensic search for specific entities and individuals in connection with events from the Second World War era, provided to us by Credit Suisse and indirectly from the SWC via Credit Suisse. The results of our forensic searches and reviews were provided to Homburger and Credit Suisse.
- (13) Credit Suisse engaged us to investigate Accounts in the pre-war, wartime, and post-war periods of the Second World War and asked us to focus the Report on the period from 1933 to 1945 ("**NS Period**"), the time period from when the Nazi party took power in Germany through the end of Second World War.
- (14) We were also asked to process evidence from the period thereafter ("**Post-War Period**") for further review if we identified relevant information during our Investigation. This was particularly relevant because the data sources we searched were not limited to the NS Period, but also contained data from more recent years. As a result of our broad investigative approach, we identified potential Accounts outside the NS Period. Where we identified plausible facts for Banking Relationships outside the NS Period, we provided the relevant information to Credit Suisse and included the respective high-level information in this Report for reference.

Historical Document Repositories and Recordkeeping Systems

- (15) To determine whether Credit Suisse maintained Accounts held by Argentine Lists Persons or the SWC Persons, we searched and reviewed documents from more than 70 years ago.
- (16) While certain records have not been retained by Credit Suisse due to the passage of time, in the 1990s, in connection with the Volcker Committee's investigation, the Bank and Arthur Andersen, in its capacity as the Volcker Committee auditor of Credit Suisse's accounts, collected, imaged, and archived a large number of documents relating to the Second World War. The most relevant historical repositories and recordkeeping systems include:
 - The physical archive and electronic files of Arthur Andersen created during the ICEP investigation (the "**Arthur Andersen Archive**") contain 856,400 accounts from the period 1933 to 1945.

⁸ Independent Commission of Experts Switzerland – Second World War (ICE), <https://www.uek.ch/en/>, (last accessed on February 28, 2023).

According to Arthur Andersen, the account database contains ~95% of all SKA client records for this period.^{9,10}

The Arthur Andersen Archive and the respective database are important repositories and data sources to which we had complete access for our Investigation.

- The Bank’s physical archives and electronic repositories, including searchable databases and image archives for inactive and dormant Accounts,¹¹ numbered Accounts, legal dossiers, and Account information submissions to the Swiss Clearing Office, which were created as part of the systematic effort to collect and archive Account information of historical Accounts during the historical investigation conducted by Credit Suisse starting in 1996.

(17) In the 1930s and 1940s, Account information was not uniformly recorded and transactions were not documented as extensively as they are today. Much of the Account and transaction data was written down by hand, and photocopying was rarely used.

(18) Consistent with the findings of prior historical investigations and research of Arthur Andersen, the Bergier Commission, and Prof. Jung, we found that available Account, asset and transaction information from the NS Period is generally limited to the preserved registry cards for closed Accounts, surviving statements on securities Accounts ("**Depot Card**"), and selected legal files, ledger information, bank information related to Account openings, formal client communication, and public records of Account reporting to the Swiss Clearing Office. Typical information provided on such documents is illustrated in the following two common bank documents, *Figure 1* and *Figure 2*, respectively.

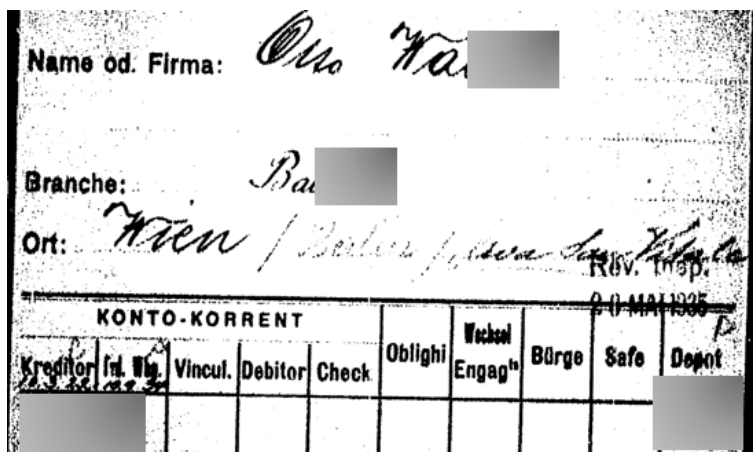


Figure 1: Exemplary SKA registry card¹²

⁹ Arthur Andersen, Credit Suisse Group – Final Report on The Second Phase Forensic Accounting Investigation, Part A, 1999, page 3.

¹⁰ Arthur Andersen, Credit Suisse Group – Final Report on The Second Phase Forensic Accounting Investigation, Part A, 1999, page 52.

¹¹ Accounts where contact with the Bank client could no longer be established for 10 years after the last contact was made.

¹² As explained in the Disclaimer, Bank client-identifying information is redacted in this Report.

Anmeldungs-Nr. 113	Datum 1948 7	Anmeldg. v. 17. 7 47	Betrag Fr. 850 00	A. Johann Dortmund	Eigentümer	Anmeldung durch: Schweiz. Kreditanstalt Basel
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STOMO

STOMO Abrechnung Form

Erstellt am
13. 54

Datum:
24. NOV. 1954

Ab. Nr.

Bl. N.

✓

Figure 2: Exemplary slip prepared by the Swiss Clearing Office (records archived in the Swiss Federal Archives)

- (19) Credit Suisse archives still contain a large volume of information for the NS Period. According to the Bank, the Central Corporate Archive contains 5,381 record series, or sets of records, for the period 1933 to 1945, amounting to ~24,000 archive units (e.g., boxes or folders), estimated to be between 2,400 to 3,000 running meters of documents. The Physical Records Archive holds another ~16 running meters of documents for the NS Period. Prof. Jung's working paper regarding his historical research into Second World War-related questions comprise another 65 running meters of documents. The archive, which contains documents regarding numbered and pseudonym Accounts closed before 1987 ("**ANOME Archive**") amounts to a further 200 running meters of archived documents.
- (20) Starting in 1973, Credit Suisse introduced the first electronic systems to record information on Accounts open at the time. Modern rules and regulations regarding KYC obligations only began to develop around the same time. Before the 1970s, Swiss banks did not, and were not required to, identify beneficial owners of Accounts and assets held at the bank. According to the Bank, the type of client and transaction background checks that are standard today were neither then possible nor required.

Historical Research and Public Sources

- (21) We performed targeted public research and used available historical sources to establish relevant historical background information, understanding that we are not experts in historical research and reappraisal.
- (22) Public sources that we considered for our review to search for the names on the Argentine Lists and SWC List included (i) the documents of the Argentinian parliamentary special commission ("**Special Commission**"),¹³ (ii) historical ship manifests for vessels departing from Germany towards South America,¹⁴ (iii) records for NS regime members in the electronic Swiss and German federal archives

¹³ Comisiones Especiales, Comisión especial investigadora de actividades antiargentinas (1941 – 1943), <https://apym.hcdn.gob.ar/comisiones-especiales/nazis/inventario/>, (last accessed on February 28, 2023).

¹⁴ Gesellschaft für Familienforschung e.V. Bremen - Staatsarchiv Bremen, Bremen Passenger Lists, <http://www.passengerlists.de/>, (last accessed on February 28, 2023).

or provided on the website of Yad Vashem, (iv) reports of the Claims Resolutions Tribunal of the Holocaust Asset Litigation,¹⁵ (v) the websites of the Office of the Historian and the National Archives and Records Administration in the United States,^{16,17} (vi) dedicated genealogical databases such as ancestry.com or familysearch.com, and (vii) relevant additional information identified by our internet research.

- (23) In 1941, the Argentine parliament called for an investigation into German organizations in Argentina. On July 23, 1941, the Special Commission requested that the police raid the premises of the UAG. The police confiscated various records, including membership books. The police also interrogated Argentine NSDAP members and reviewed the UAG's bank Accounts.
- (24) Between August 29, 1941 and November 28, 1941, the Special Commission published five reports and investigation documents, which are electronically available in public archives that contain ~40,000 documents.¹⁸ These publicly available reports address the structure of the Argentine NSDAP, the financial transactions of the German embassy in Buenos Aires, news agencies and press services, German schools in Argentina, the German Labor Front DAF (or Deutsche Arbeitsfront), and the UAG.

Approach and Methodology

- (25) For our Investigation, Credit Suisse granted us direct access to its archive resources, and we determined, with input from the Bank and Homburger, which repositories to include in our Investigation based on their potential relevance to our work. The main repositories considered in our review included Credit Suisse's electronic document and image archives, the Bank's historical databases for dormant Accounts, the Bank's records of account holders and beneficial owners of active and inactive Accounts (including numbered Accounts, signatories, and power of attorney holders), and physical documents in the Central Corporate Archive and Physical Records Archive. Further, we had complete access to the Arthur Andersen Archive and forensically restored copies of the electronic files from the Arthur Andersen Archive. We also had unfettered access to the relevant working papers of Prof. Jung and the archival materials that he assembled in connection with his research ("**Prof. Jung Archive**").
- (26) Using modern investigation technology (including fuzzy name search algorithms), a state-of-the-art review platform (Relativity), and access to additional public information, we searched the substantial corpus of material for Argentine Lists Persons and SWC Persons.

¹⁵ Claims Resolution Tribunal, Holocaust Victim Asset Litigation, www.crt-ii.org/, (last accessed on February 28, 2023).

¹⁶ Department of State United States of America, Office of the Historian, <https://history.state.gov/>, (last accessed on February 28, 2023).

¹⁷ The U.S. National Archives and Records Administration, <https://www.archives.gov/>, (last accessed on February 28, 2023).

¹⁸ Comisiones Especiales, Comisión especial investigadora de actividades antiargentinas (1941 – 1943), <https://apym.hcdn.gob.ar/comisiones-especiales/nazis/inventario/>, (last accessed on February 28, 2023).

(27) As a first step, we identified reliable versions of the UAG List and Argentine NSDAP List referenced by the SWC.^{19,20,21} Extracts of the respective lists are shown as *Figure 3* and *Figure 4*, respectively. Credit Suisse provided us, via Homburger, with the SWC List, for which an extract is shown as *Figure 5*.

Nº 8

LISTA DE AFILIADOS A LA UNION ALEMANA DE GREMIOS

Distrito: Florida				Distrito: Florida			
NOMBRE	Fecha de nacimiento	Ingreso	Número	NOMBRE	Fecha de nacimiento	Ingreso	Número
Althoff, Franz	31- 3-92	1- 8-37	5.492	Hora, Hans	3- 5-94	1- 4-38	3.961
Apfelböck, Johann	3- 5-98	1- 2-37	3.897	Hueber, Josef	2- 5-00	1-12-40	8.831
Auschat, Bruno	24- 3-91	1- 7-40	7.903	Hüttner, August	22- 8-01	1- 1-41	8.833
Bähr, Erich	7- 5-01	1-12-35	3.898	Huth, Hans Georg	31- 1-00	1- 4-39	3.962
Baumgarten, Kurt	21- 2-01	1- 1-38	3.899	Illmayer, Karl	22- 10-08	1- 10-00	889

Figure 3: Extract of the UAG List

Nazi Party membership records—Continued

ARGENTINA

Number	Name	Date entered	Birthdate	Birthplace	Address	Occupation
1296876	Appel, Adam	Apr. 1, 1932	June 8, 1893	Gonsenheim	Buenos Aires, Belgrano Congress 3325	Cabinetmaker.
2196689	Appelhaus, Elena Marie	Oct. 1, 1934	Feb. 8, 1890	Buenos Aires	Buenos Aires, Comesa 1330	Housewife.
3406346	Appelhaus, Kurt	Mar. 1, 1934	Jan. 16, 1882	Osterode	do	Clerk
7017347	Aebatz, Emmerich	Feb. 1, 1939	Oct. 26, 1916	Ober-Radkersburg	Ayacueho, F. C., Sud.	Do.
2189382	Ackerhann, Franz	Oct. 1, 1934	July 12, 1902	Hannover	Buenos Aires, Los Patos, 1938	Do.
3281215	Albert, Johannes	July 1, 1933	Mar. 6, 1906	Nürnberg	Buenos Aires, Bambas 7 Depia	Do.
3799632	Albendorf, Rudolf	Mar. 1, 1928	June 10, 1894	Münster	do	Do.

Figure 4: Extract of the Argentine NSDAP List

LIST OF SENIOR NAZI OFFICIALS, LEADERS OF THE SS AND THE CONCENTRATION CAMPS, INDUSTRIALISTS AND BANKERS WHO MAY HAVE TRANSFERRED LOOTED ASSETS TO NEUTRAL COUNTRIES

COMPILED BY THE SIMON WIESENTHAL CENTER

#	Name (Last, First)	DOB	Position
1.	Abetz, Otto	1903	German Ambassador to Vichy France
2.	Abs, Herman Josef	1901	German Banker - Financed industrial complex at Auschwitz as Chairman of the Deutsche Bank.
3.	Amann, Max	1891	Hitler's personal business manager and newspaper proprietor.
4.	Ambros, Otto		Chief of Chemical Warfare Committee at I.G. Farben, production chief for poison gas.
5.	Angerer, Sepp		Early procurer of artwork for Goering
6.	Axmann, Artur	1913	Reich Youth Leader in Führerbunker during Hitler's last days
7.	Bach-Zelewski, Erich	1899	General of the Higher SS & Police. Notorious murderer of Jews.
8.	Backe, Herbert	1896	Reich Minister for Food and Agriculture during last year of Reich.
9.	Baer, Richard	1911	Commandant of Auschwitz & Dora concentration camps.
10.	Baranowski, Hermann		Early commandant of Sachsenhausen concentration camp.
11.	Barbie, Klaus	1913	Gestapo Chief in Lyon, France. Notorious hunter of Jews & resistance movement members.
12.	Barbie, Regine		Wife of Klaus Barbie, nee Willms/Wilhelms
13.	Barthel, Gustav		Principal assistant of Kajetan Mühlmann

Figure 5: Extract of the SWC List

(28) We scanned, analyzed, and structured these lists and created electronic name lists ("**Name Lists**", the individuals on the Name Lists being "**Search Persons**").

¹⁹ Comisión Investigadora de Actividades Antiargentinas, Informe No 5, Camera de Diputados de la Nación, 1941.

²⁰ United States Senate Committee on Military Affairs, Argentina Nazi Party Membership Records, March 1946, Stanford University Libraries.

²¹ United States Senate Committee on Military Affairs, Argentina Nazi Party Membership Records, March 1946, Columbia University.

- (29) Next, we included corrections or variations of names to account for apparent misspellings on the original lists (e.g., Johannas as a variation of Johannes) or for the fact that individuals who moved to Argentina during this time period may have used the Spanish version of their first name when opening an Account (e.g., Pablo as the Spanish version of Paul) ("**Name Variant**").
- (30) In total, the Name Lists comprised 9,880 Search Persons, with a combined total of 25,460 names, including Name Variants. We provided these Name Lists to Credit Suisse to search across the identified relevant repositories under our guidance ("**Name Matching**"). We initially assessed different Name Matching options and decided, based on the results of pilot tests, to use the Bank's internal proprietary search tool "**SAMatching**". SAMatching is widely used in the Bank, among other things, for the identification of politically exposed persons or to screen Bank client-related parties against sanctions lists. SAMatching uses a combination of different fuzzy name search algorithms to identify names when they are not written the same way (e.g., *Michael Bacher* also matches *Michael Bachler*, *Michael Lukas Bucher*, or *Michael B.*). SAMatching was parameterized for the Investigation at the lowest supported accuracy level (80% for bulk searches) to ensure the highest coverage for matched documents and account for misspellings, abbreviations, and alternate spellings.
- (31) The Name Matching of the 25,460 names through SAMatching produced a total of ~26 million "**Hits**." A Hit occurs when, based on the SAMatching's fuzzy name search algorithm, a name on the Name Lists matches a name entry contained in the electronic client information repositories of SAMatching ("**Data Pool**"). Following the Name Matching, we processed the ~26 million Hits with technology for de-duplication, resulting in ~10.3 million Documents that were uploaded to the dedicated review platform, Relativity ("**Review Platform**").
- (32) Since we asked the Bank to conduct the Name Matching and produce Hits across all defined Data Pools and without time restrictions, we had to implement processes to identify the Documents in the Review Platform that were potentially relevant to our Investigation and filter out obvious false positive Documents. For example, if the date of birth of an individual listed on a Document was different from the date of birth of an Argentine Lists Person, or the recorded nationality or residence of the Bank client was different than Argentina or a country that was part of "Nazi Germany", the Document was filtered out and not processed to the next review step.²²
- (33) The focus of the Investigation of the Argentine Lists was on SKA, which is the predecessor bank mentioned in the Press Release, while the SWC List Assessment included all Credit Suisse predecessor banks in Switzerland. In the event we identified reasonable evidence of Banking Relationships maintained by Argentine Lists Persons at Credit Suisse predecessor banks in Switzerland other than SKA, Credit Suisse asked us to further investigate these.

²² The countries that were part of "Nazi Germany" as of 1941 were Germany, Poland, Austria, Czech Republic, and Hungary.

- (34) The process allowed us to filter out a significant portion of false positive Documents (~95% of Documents for the Argentine Lists). Because of the different historical context and significance of the SWC List, for Documents related to SWC Persons, the criteria applied to filter out false positive Documents were more limited, resulting in fewer Documents being filtered out.
- (35) To prevent the automated exclusion of potentially relevant information from further review, we established a special automated protection mechanism ("**Automated Protection Mechanism**"). For Documents related to the Argentine Lists, this protection applied if a connection to Argentina was identified based on the application of 427 Argentina-related search terms. These search terms included major cities and regions of Argentina. By way of example, if a Document hit on the search term "Florida", a neighborhood in Buenos Aires, we manually reviewed it. We also applied the same process to Documents for which the first and last name of the Search Person and the Bank client was identical ("**Identical Name Match**") and their dates of birth were similar.²³
- (36) Following this filtering process and the application of the Automated Protection Mechanism, we manually reviewed the remaining ~480,000 Documents through various steps.
- (37) A significant number of these results were obvious false positives - that is, the matched name was clearly not the person we searched for - because SAMatching was set to the lowest supported accuracy level for bulk searches to ensure that we received the largest number of potentially relevant documents. To filter out these false positives, we manually assessed whether the name of the Search Person and the name of the Bank client were either similar ("**Name Similarity**") or an Identical Name Match ("**Manual Name-Combinations Review**").
- (38) We reviewed the Bank client names resulting from SAMatching and manually compared them to the names of the Search Persons, including Name Variants. For example, if the Search Person's name was *Michael Bacher* and the result of SAMatching was:
- *Michael Bacher*, the Name-Combination *Michael Bacher – Michael Bacher*, and all related Documents, were processed to the next manual review step.
 - *Michael B.*, the Name-Combination *Michael Bacher – Michael B.*, and all related Documents, were processed to the next manual review step.
 - *Michael Lukas Bucher*, which still had an accuracy score of more than 80%, the Name-Combination *Michael Bacher – Michael Lukas Bucher*, and all related Documents, were filtered out and not part of the next manual review step.
- (39) Following the Manual Name-Combinations Review, we conducted a first-level review of available information in the Documents and collected relevant information, e.g., date of birth or domicile, for further review and categorization ("**First-Level Review**").

²³ We treated dates of birth as similar if the date of birth recorded in the Bank's client information and the date of birth recorded on the Name Lists were within five years.

- (40) Many of the Documents we reviewed at this stage were handwritten and often had to be deciphered, requiring additional effort to analyze a Document.
- (41) In the second-level review ("**Second-Level Review**"), we evaluated Documents identified in the First-Level Review to assemble a file with all available Documents pertaining to the same Bank client ("**Bank Person**"). For example, all Documents that mentioned *Michael Bacher* and contained additional information linking a Bank client by that name were consolidated in a specific file ("**Bank Person File**").
- (42) Based on the available information for a Bank Person, we decided whether sufficient plausible facts exist to conclude that the Bank Person and the Search Person are the same individual - and that the Search Person had an Account at SKA or another Credit Suisse predecessor bank in Switzerland.
- (43) For Search Persons for whom we identified plausible facts for a Banking Relationship and for those for whom we did not make a determination in the Second-Level Review based on the available information, we initiated an **Identity Investigation** to assess whether sufficient plausible facts exist to conclude that the Bank Person and the Search Person are the same person, and for all responsive Accounts, whether additional information on the nature, content, size, and other features can be identified. This included manual searches in the Bank's Corporate Central Archive and Physical Records Archive, including searches in record series that are not stored electronically.
- (44) We then reviewed the additional information identified in the Corporate Central Archive and Physical Records Archive, and investigated available public sources. For example, we reviewed historical ship manifests for vessels departing from Germany to South America for individuals by the same name and consulted genealogical resources. In some cases, information from ship manifests provided information on family members of Argentine Lists Persons. Occasionally, individuals with the same name as these family members appeared on Bank Documents, which allowed us, based on sufficient plausible facts, to conclude that the Bank Person and the Search Person are the same.
- (45) Finally, based on all available facts and after the extensive review described above, we determined, for each Search Person, whether there were sufficient plausible facts for a Banking Relationship.
- (46) To confirm the consistency of key processing and review steps of the Investigation, we implemented continuous quality control procedures and a number of targeted quality assurance measures.
- (47) For SWC Persons we had an additional focus on independently double-checking the results published in 2001 by Prof. Jung. We also validated the completeness of the Documents our Investigation identified compared to the documents Prof. Jung identified.
- (48) For a period of more than two years, a team of up to 50 AlixPartners consultants devoted more than 50,000 hours to the Investigation.
- (49) Overall, we investigated 9,880 Search Persons and conducted forensic searches for a combined total of 25,460 names, including Name Variants. The Name Matching resulted in ~26 million Hits and ~10.3 million Documents containing potentially relevant information.

- (50) Our team manually reviewed over 480,000 Documents comprising more than 2 million pages, and conducted research on millions of pages in public sources, in line with the described approach ("**Review Approach**").
- (51) The Bank provided a dedicated archive team of up to six specialists to search and produce ~23,000 documents from the Credit Suisse's physical archives in response to specific archive requests from AlixPartners. Additionally, we considered ~60,000 electronic files from the Arthur Andersen Server during the review and collected hundreds of physical documents from the Arthur Andersen Archive.

Findings

- (52) Prior to 1945, banks recorded much less Bank client information than today due to less stringent regulatory requirements and because the information was typically written down by hand. Therefore, only limited asset and transaction information is available in surviving Bank documents for the NS Period.
- (53) Our Investigation findings are mainly based on Account information identified on historical Account registry cards, Depot Cards, legal files, and records related to the reporting of Accounts to the Swiss Clearing Office.

Argentine Lists

- (54) Our Investigation and extensive Document review of Argentine Lists Persons identified eight individuals on the Argentine Lists who held an Account at SKA, at some point between 1933 and 1945. An overview of these Accounts is shown in *Table 1*.

Ind.	List and Entry Date	Account Opening Date	Account Closing Date	Available Asset Information and Source ²⁴
A.1	UAG (1936)	1929	1936 ²⁵	Less than CHF 50,000 in 1932; Depot Card
A.2	NSDAP (1936)	1931	1934	Less than CHF 250,000 in 1934; Depot Card
A.3	UAG (1935)	1931	1935	Not identified
A.4	UAG (1938)	1931	1974	CHF 308,000 in 1934; Depot Card
A.5	UAG (1940)	1933	1934	Not identified
A.6	NSDAP (1932)	1933	1936	Less than CHF 20,000 in 1933; Depot Card
A.7	UAG (1935) NSDAP (1935)	Not identified	1934	Not identified
A.8	UAG (1940) NSDAP (1934)	1935	1937	Less than CHF 100 in 1936; ledger information

Table 1: Overview of Argentine Lists Persons with plausible facts for a Banking Relationship in the NS Period

²⁴ Information may be unrepresentative of the full extent of assets held by the individual, as it only provides a snapshot at a specific point in time. Information shows the highest identified amount.

²⁵ The Account was closed two months after the individual entered the UAG in 1936.

- (55) Seven of the Accounts were closed by January 1937 and, in four of these cases, the individual joined the UAG or Argentine NSDAP after the Account was closed (Individuals A.2, A.3, A.5, and A.7 in *Table 1*).
- (56) One of the eight Accounts was open during the Second World War, and the account holder was identified on the UAG List but not on the Argentine NSDAP List (Individual A.4 in *Table 1*). Multiple records in the period from 1931 to 1945 on the assets in this Account have survived. Based on the available information, the highest identified balance was CHF 308,000 in March 1934.²⁶ For this Account we did not identify significant (i.e., more than CHF 10,000) asset increases or asset inflows during the Second World War (from September 1939 to 1945).
- (57) Based on the work we performed, we identified no new Account that was opened for an Argentine Lists Person between February 1935 and 1945. For five of the eight individuals, selected asset information was identified (*see Table 1*).
- (58) Based on our review of the available underlying identified documents relating to these eight Accounts, we have identified no evidence that would indicate (i) that any of the eight Accounts were ever dormant, or (ii) that the one account that was open between January 1937 and 1945 (Individual A.4 in *Table 1* above) had significant (i.e., more than CHF 10,000) asset increases or asset inflows during the Second World War (September 1939 – 1945).²⁷

SWC List

- (59) Our SWC List Assessment confirmed that the eight individuals identified by Prof. Jung for the period between 1933 and 1945 had Accounts. We identified one additional SWC Person, a senior manager of a German corporation, who held an Account at SKA that was opened in 1929 and closed in 1933 (Individual S.2 in *Table 2*).²⁸ An overview of these Accounts is shown in *Table 2*.

²⁶ Note that information on assets in his current Account has not been retained.

²⁷ In the 1930s and 1940s, transactions were not documented to the same degree as they are today and information on the originators and beneficiaries of transactions is generally not available in the still available documents from that period.

²⁸ For three SWC Persons with an Account identified by both us and Prof. Jung, we have identified further information on personal Accounts in addition to the prior findings of Prof. Jung.

Ind.	Background on Individual	Account Opening Date	Account Closing Date	Prof. Jung Assessment	Available Asset Information and Source ²⁹
S.1	German engineer. Not tried at Nuremberg. Exonerated in denazification program.	1923	1990	Person Identity identified	Less than CHF 200,000 in 1948; Swiss Clearing Office
S.2	German executive. Tried at Nuremberg and acquitted.	1929	1933	No Person Identity identified	Not identified
S.3	German industrialist. Indicted at Nuremberg but not tried.	1934	1936	Person Identity identified	Not identified
S.4	Tried at Nuremberg. Convicted and executed.	1934	1935	Person Identity identified	Not identified
S.5	German banker. Not indicted at Nuremberg. Exonerated in denazification program	1936	1994	Person Identity identified	Less than CHF 9 million in 1993; Account statements
S.6	Banker. Acquitted at Nuremberg.	1939	1954	Person Identity identified	Less than CHF 100,000 in 1945; Swiss Clearing Office
S.7	Politician. Acquitted at Nuremberg.	1941	1971	Person Identity identified	Less than CHF 1 million in 1945; Swiss Clearing Office
S.8	German intelligence officer. Witness at Nuremberg.	1945 ³⁰	1964	Person Identity identified	Not identified
S.9	SS commander. Convicted.	<1945 ³¹	Not identified	Person Identity identified	Less than CHF 200 in 1945; Swiss Clearing Office

Table 2: Overview of SWC Persons with plausible facts for a Banking Relationship in the NS Period

Identified Post-War Period Accounts

- (60) As a result of our investigative approach, we identified 70 additional Argentine Lists Persons and 12 SWC Persons who held an Account at a Credit Suisse predecessor bank in Switzerland after 1945. These results are further described in *Chapter 8* of this Report.³²

Summary of Findings

Argentine Lists

- (61) Given that for the Second World War era and many years thereafter, it is generally not possible to find information for individuals that contributed to Accounts of third parties if they were not the named account holder because (i) the transactional records and account statements contained only limited information on the originator of inbound payments and (ii) limited transactional records and account statements from that time survived, the focus of our work was on identifying Accounts and

²⁹ Information may be unrepresentative of the full extent of assets held by the individual, as it only provides a snapshot at a specific point in time. Information shows the highest identified amount.

³⁰ Date refers to earliest identified banking activity – Account opening date not identified.

³¹ The Account opening date could not be identified but according to Prof. Jung's work, the Account was reported in 1945 to the Swiss Clearing Office.

³² Out of the 70 Argentine Lists Persons, 65 maintained an Account with SKA, four maintained an Account with Schweizerische Volksbank, and one maintained an Account with Bank Leu.

the available related asset information for the Argentine Lists Persons. Based on this and the eight Accounts identified for Argentine Lists Persons during the NS Period, we observe:

- that with respect to the SWC statements regarding the individuals named on the UAG List and Argentine NSDAP List that "[...] [m]any [Nazis in Argentina] apparently had accounts transferred to Credit Suisse [...]," we have not seen evidence in the documentation examined that supports this statement since only eight Accounts held in the name of Argentine Lists Persons were identified in the NS Period; and
- with respect to the SWC Statement that "[...] We believe [it is] very probable that these dormant accounts hold monies looted from Jewish victims [...]," we have not seen evidence in the documentation examined that supports this statement with respect to the identified Accounts since none of the eight identified Accounts were ever dormant, and seven of the Accounts were already closed in January 1937, and the one remaining open Account after January 1937 had no identified significant (i.e., more than CHF 10,000) asset increases or asset inflows during the Second World War.

SWC List

- (62) Our SWC List Assessment of the 311 SWC Persons confirmed the work of Prof. Jung and the previously identified eight individuals with an Account for the period between 1933 and 1945.³³ We identified one additional SWC Person who held an Account at SKA which was opened in 1929 and closed in 1933.

³³ For three SWC Persons with an Account identified by both us and Prof. Jung, we have identified further information on personal Accounts in addition to the prior findings of Prof. Jung.

1 Background

- (63) In December 2020, Credit Suisse, through its external counsel Homburger, engaged AlixPartners to investigate independently specific topics and questions that the SWC raised in connection with events from the era of the Second World War.
- (64) The Investigation was carried out pursuant to the Engagement Letter dated December 3, 2020, and a subsequent variation letter thereto, dated December 1, 2021.

1.1 Concern raised by the SWC in the March 2020 Press Release

- (65) On March 2, 2020, the SWC published a Press Release entitled "*Wiesenthal Centre Reveals 12,000 Names of Nazis in Argentina, Many of Whom Apparently Had Accounts Transferred to Credit Suisse*".³⁴ The SWC simultaneously shared the same concerns in a letter with Credit Suisse.

1.1.1 Unión Alemana de Gremios

- (66) According to the Press Release, an Argentine investigator had found a list containing the names of "[...] 12,000 supporting members of the cover-up 'Unión Alemana de Gremios' (the German Union of Syndicates) [...]". The Press Release further states that, in the 1940s, a special commission of Argentina's parliament had "[...] captured the complete cache of documents in a raid [...]" on the UAG. The SWC wrote that it had "[...] a copy of the list of Nazis based in Argentina, among whom [are] several account holders of funds that were sent to Schweizerische Kreditanstalt [...]" and "[...] many [of whom] contributed to one or more bank accounts at Schweizerische Kreditanstalt [...]", one of the predecessor banks to Credit Suisse. The SWC also wrote that they believed it "[...] very probable that these dormant accounts hold monies looted from Jewish victims [...]".
- (67) To have "contributed to" an Account, as stated by the SWC, one either had to transfer assets to an Account which was held by a third party or to an Account held in the name of the individual that made the transfer. For the Second World War era and many years thereafter, it is generally not possible to find information for individuals that contributed to Accounts of third parties if they were not the named account holder, because (i) the transactional records and account statements contained only limited information on the originator of inbound payments; (ii) limited transactional records and account statements from that time survived; and (iii) regulations that require the identification of an account's beneficial owners were first introduced in 1977.³⁵

³⁴ Simon Wiesenthal Center, *Wiesenthal Centre Reveals 12,000 Names of Nazis in Argentina, Many of Whom Apparently Had Accounts Transferred to Credit Suisse*, March 2, 2020, <https://www.wiesenthal.com/about/news/wiesenthal-center-argentina-nazi.html>, (last accessed on February 28, 2023).

³⁵ The Bergier Commission explained that it is not feasible to attempt to identify intermediaries for accounts from the NS Period. As the Bergier Commission wrote, there are too many unknowns, there is no satisfactory list of beneficial owners, and the few recorded connections are of little informative value because few additional documents survive that shed light on the transactions. See Uhlig, Christiane / Barthelmess, Petra et al. (eds.): *Tarnung, Transfer, Transit. Die Schweiz als Drehscheibe verdeckter deutscher Operationen (1939-1952)*, Zurich 2001 (Publications of the Independent Commission of Experts Switzerland (ICE) – Second World War, ICE, vol. 9), page 153.

- (68) In light of these constraints, Credit Suisse decided to focus the investigation on whether plausible evidence could be identified that the Bank maintained Banking Relationships for Argentine Lists Persons.
- (69) AlixPartners was engaged to carry out an independent factual forensic investigation and to determine, based on a comprehensive, robust and consistent process and sound methodology:
- i. whether SKA maintained Banking Relationships with members of UAG, and
 - ii. for all responsive Accounts, whether additional information on the nature, content, size and other features of these Accounts could be identified.

1.1.2 Nazi party members in Argentina

- (70) Following conversations with the Bank regarding the scope of the Investigation, given references in the Press Release to a list with "*[...] an official figure of 1,400 members of the NSDAP/AO (the German National Socialist Party / Foreign Organization), based in Argentina [...]*" that could be publicly identified, on December 1, 2021, Credit Suisse and Homburger extended AlixPartners' scope of work to include the Argentine NSDAP List.

1.1.3 Additional statements in the Press Release

- (71) The Press Release also states that there were "*[...] an additional 8,000 [individuals] affiliated to other Nazi organizations. These included such German companies as IG Farben [...] and financial bodies such as the 'Banco Alemán Transatlántico' and the 'Banco Germánico de América de Sur'*".
- (72) Based on our research and information provided by Credit Suisse, we have not been able to identify a reliable source for the "*additional 8,000 individuals*" associated with this statement and, accordingly, we did not further investigate this topic.
- (73) Credit Suisse conducted its own internal research with respect to the specific entities mentioned in the Press Release.

1.2 SWC List Assessment

- (74) In February 1997, the SWC asked the Swiss government and the Swiss Bankers Association to determine whether Swiss banks maintained, or had previously maintained, Banking Relationships with SWC Persons.

- (75) The SWC List contains 334 entries with names that relate to 311 prominent NS regime members, industrialists, and bankers, who, according to the SWC, "*had the ability and who may have opened accounts in Switzerland*".³⁶ Credit Suisse investigated the SWC List at that time through the historical research of Prof. Jung and the ICEP, who published the results in 2001.³⁷
- (76) On October 7, 2022, our engagement was extended to assess independently the accuracy and completeness of the results of Credit Suisse's prior historical research of the SWC List conducted by Prof. Jung, and to review any newly identified Account information related to the period 1933 to 1950 at Credit Suisse's predecessor banks in Switzerland, referred to as the SWC List Assessment.

1.3 Specific entities and individuals in connection with events from the Second World War era

- (77) We were asked to perform a forensic search for specific entities and individuals in connection with events from the Second World War era, provided to us by Credit Suisse and indirectly from the SWC via Credit Suisse. The results of our forensic searches and reviews were provided to Homburger and Credit Suisse.

1.4 Previous historical research and investigations

- (78) The relationship of the NS regime in Germany with Swiss banks has been discussed since the end of the Second World War. In the 1990s, various investigations were launched in Switzerland. While the focus in many of these investigations was on assets belonging to victims of Nazi persecution, selected work was conducted regarding specific relationships of NS-related parties with, primarily, large Swiss banks, including Credit Suisse.
- (79) The most important historical investigations and relevant research for our Investigation include:
- the research and published results by the **Bergier Commission**. In 1996, the Swiss government established the Bergier Commission under the leadership of Prof. François Bergier to research the role of Switzerland and its businesses during the Second World War, with particular focus on the volume and fate of assets moved to Switzerland before, during, and immediately after the Second World War. The Bergier Commission comprised American, Israeli, Polish, and Swiss historians and was supported by a team of researchers. The Swiss Parliament gave the Bergier Commission unprecedented power, resources, and access to review the archives of Swiss private companies, including Credit Suisse. Between 1997 and 2002, the Bergier Commission published 25 studies and a final report.³⁸

³⁶ Letter from SWC to Arnold Koller, February 1, 1997.

³⁷ Prof. Dr. Joseph Jung, *Zwischen Bundeshaus und Paradeplatz – Die Banken der Credit Suisse Group im Zweiten Weltkrieg*, Neue Züricher Zeitung Publishing, 2001; Prof. Dr. Joseph Jung, *Credit Suisse Group Banks in the Second World War: A Critical Review*, Neue Züricher Zeitung Publishing, 2002.

³⁸ Independent Commission of Experts Switzerland – Second World War, *Final Report of the Independent Commission of Experts Switzerland – Second World War*, 2022.

While the entire work of the Bergier Commission provides important background information on Swiss banking activities before, during, and immediately after the Second World War, the most relevant parts for our Investigation include the Bergier Commission's targeted research in relation to transactions and Accounts of specific Nazis, published in (i) chapter 4.12 *German Camouflage and Relocation Operations* of the final report,³⁹ (ii) study *Volume 9 Cover-up, Transfer, Transit. Switzerland as a Hub for German Covert Operations (1938–1952)*,⁴⁰ (iii) study *Volume 13 The Swiss Financial Center and Swiss Banks during the Nazi Period. The Major Swiss Banks and Germany (1931-1946)*,⁴¹ and (iv) study *Volume 14 Switzerland and its Securities Transactions with the "Third Reich". Trading, Looting, and Restitution*.⁴²

- the research and documentation of the work conducted by Arthur Andersen at Credit Suisse on behalf of the Independent Committee of Eminent Persons (ICEP), which is further described in *Chapter 3.5*.
- the Bank's internal research, led by Prof. Jung, related to the role of Credit Suisse before, during, and immediately after the Second World War and his research to identify the Bank's "problematic clients" ("*Problematische Kunden*") with SWC Persons.⁴³ The research conducted by Prof. Jung is further described in *Chapter 7.4*. The description of the physical archive where the working papers of Prof. Jung are stored is provided in *Chapter 3.4.5*.

³⁹ Independent Commission of Experts Switzerland – Second World War, Final Report of the Independent Commission of Experts Switzerland – Second World War, 2022, page 368-390.

⁴⁰ Independent Commission of Experts Switzerland – Second World War, Christiane Uhlig, Petra Barthelmess, Mario König, Peter Pfaffenroth, Bettina Zeugin, Publications of the ICE, Volume 9, Cover-up, Transfer, Transit. Switzerland as a Hub for German Covert Operations (1938–1952).

⁴¹ Independent Commission of Experts Switzerland – Second World War, Marc Perrenoud, Rodrigo López, Florian Adank, Jan Baumann, Alain Cortat, Suzanne Peters, Publications of the ICE, Volume 13, The Swiss Financial Center and Swiss Banks during the Nazi Period. The Major Swiss Banks and Germany (1931-1946).

⁴² Independent Commission of Experts Switzerland – Second World War, Hanspeter Lussy, Barbara Bonhage, Christian Horn, Publications of the ICE, Volume 14, Switzerland and its Securities Transactions with the "Third Reich". Trading, Looting, and Restitution.

⁴³ Prof. Dr. Joseph Jung, *Zwischen Bundeshaus und Paradeplatz – Die Banken der Credit Suisse Group im Zweiten Weltkrieg*, Neue Züricher Zeitung Publishing, 2001; Prof. Dr. Joseph Jung, *Credit Suisse Group Banks in the Second World War: A Critical Review*, Neue Züricher Zeitung Publishing, 2002.

INVESTIGATION SETUP

2 Investigation setup

(80) Starting in December 2020 we defined with Homburger and Credit Suisse the setup for our secured environment, an effective workspace for our Investigation, and a state-of-the-art Review Platform (Relativity) as foundation to develop and implement a sound forensic **Investigation Methodology** that ensures comprehensive, robust processes and reproducible review results, work products, and audit logs.

2.1 Secure IT infrastructure and processing environment

(81) The Bank has provided us with secure IT infrastructure, the requested access permissions, tools, and direct access to relevant IT experts to establish our secured workspace for the Investigation and secured Bank data exchange processes. We were also granted access to selected live system tools to conduct our Investigation. *Figure 6* provides an overview of the IT infrastructure setup and processing environment.

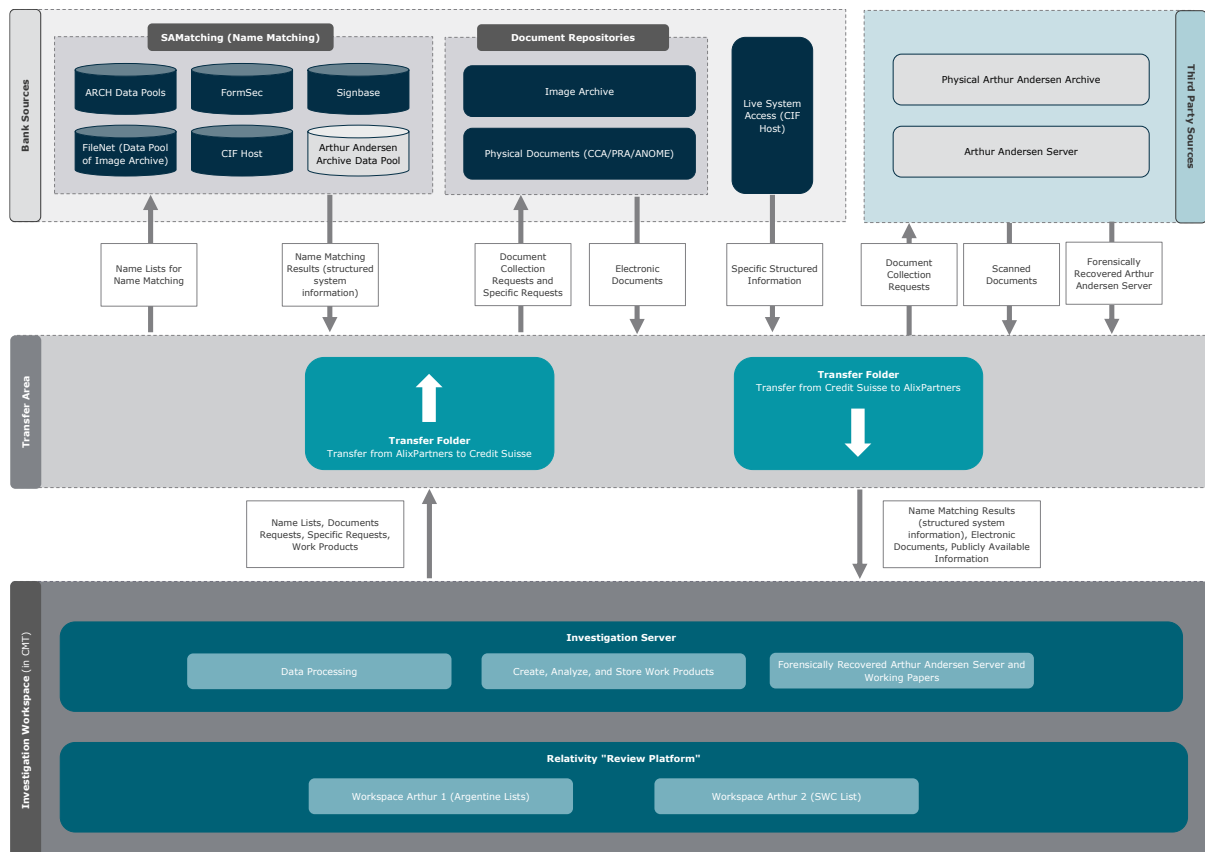


Figure 6: Overview of the IT infrastructure and processing environment

2.1.1 Physical infrastructure

(82) In response to our request, Credit Suisse provided us a separate secured physical workspace for the AlixPartners team on Bank premises in Zurich, Switzerland, equipped with dedicated desktop stations to access the Credit Suisse IT infrastructure and the secured workspace for our Investigation.

Credit Suisse also accommodated for the specific requirements of the Swiss Federal Office of Public Health (Bundesamt für Gesundheit) for on-site work during the outbreak of the COVID-19 pandemic.

- (83) We were also provided secured notebook computers for our senior Swiss-domiciled AlixPartners team members to ensure remote communication and access to the Credit Suisse IT Infrastructure.

2.1.2 Secure IT Environment and data exchange

- (84) In the Engagement Letter, it was agreed that AlixPartners would conduct the Investigation on an independently operated secure technical infrastructure on Credit Suisse premises ("**Investigation Workspace**"). AlixPartners, Homburger, and Credit Suisse formally agreed on the setup of the Investigation Workspace in an IT infrastructure agreement, dated February 9, 2021.⁴⁴
- (85) The Investigation Workspace was independently operated by us on Credit Suisse infrastructure with the support of specified Credit Suisse system administrators ("**IT Administrator**") who worked under our guidance on the setup, administration, and maintenance of the Investigation Workspace. The IT Administrators had access to the Investigation Workspace for the sole purpose of supporting us in administrative tasks (e.g., backups, data transfers) or to address operational IT issues.⁴⁵ No other personnel had access to our Investigation Workspace.
- (86) For the import, processing, and review of all source data and relevant other information in the context of the Investigation, we requested that the Bank set up dedicated data exchange, processing, and review platforms (refer to *Figure 6*):
- All relevant data, working documents, and results of the Investigation are stored in the Investigation Workspace at Credit Suisse in Switzerland. The Investigation Workspace contained a dedicated virtual server for AlixPartners to create, process, and analyze documents and data in the context of the Investigation ("**Investigation Server**"). The Investigation Server had standard Microsoft Office software installed and we had flexibility to define our work environment. Credit Suisse also installed required software upon our request for specific tasks, such as for the forensic restoration of the recovered Arthur Andersen Server.
 - Together with the IT Administrators, we set up two independent Relativity workspaces (Workspace *Arthur 1* for the Argentine Lists and *Arthur 2* for the SWC List) in our Investigation Workspace for the processing and review of all documents and data relevant for our Investigation ("**Review Platform**"). Relativity is a state-of-the art document review platform used within Credit Suisse that allows efficient processing, review, and document management for investigations. Credit Suisse also provided us access to the Microsoft SQL Server backend instance of the Relativity Workspaces *Arthur 1* and *Arthur 2* to allow for customization of the Review Platform.

⁴⁴ IT Infrastructure Agreement, dated February 9, 2021.

⁴⁵ General CS IT maintenance and IT security updates remained possible at any time and compliance with applicable regulatory requirements was maintained.

Together with the IT Administrators, we set up a secured transfer area to import and export documents, data, and information between Credit Suisse and the Investigation Workspace through dedicated folders with strict access permissions ("**Transfer Folders**").⁴⁶ AlixPartners used these Transfer Folders to (i) exchange the name lists, Name Matching results, and retrieved electronic documents from the technology platform of the centralized electronic archiving function that contains scanned documents ("**Image Archive**"), (ii) obtain information from the live systems identified by AlixPartners, (iii) share electronic documents, databases and case-specific information from third party sources, including the Arthur Andersen Archive and publicly available information, and (iv) exchange work products with the Credit Suisse project management office ("**PMO**"), which was established as a single point of contact for AlixPartners.

- Most of the source data and documents for the Investigation have been provided by Credit Suisse from Bank sources. The operation of the Name Matching tool SAMatching, as well as the retrieval of the underlying documents from the Image Archive and the physical archives, was conducted by Credit Suisse experts under the guidance and quality control of AlixPartners (see *Chapter 4.3.4*).
- A separate data import process was agreed for relevant data and documents collected from the Arthur Andersen Archive, which was created by Arthur Andersen on behalf of ICEP in the 1990s.

The Arthur Andersen Archive is physically located on Credit Suisse's premises in Zurich, Switzerland, and contains the archive of the collection of all still available documents on Accounts at Credit Suisse that were open or opened during the period 1933 to 1945.⁴⁷ After the bankruptcy of Arthur Andersen in 2002, Homburger was appointed as the administrator of the Arthur Andersen Archive. Credit Suisse has not had direct access to the Arthur Andersen Archive.

AlixPartners forensically recovered the historical Arthur Andersen Server located in the Arthur Andersen Archive and extracted the working documents and relevant Arthur Andersen Database used by Arthur Andersen. The Arthur Andersen Database was used by Arthur Andersen in 1999 to document their search and review results based on the collected relevant documents in the Arthur Andersen Archive. The setup of the Arthur Andersen Database, the investigation approach, and the results of Arthur Andersen's work are described in their final report that was available to us.⁴⁸

- Data and documents we identified, copied, and collected from the Arthur Andersen Archive were transferred to the Investigation Workspace through dedicated Transfer Folders, following a pre-defined process (described in *Chapter 4.3.3*) and Security Protocol.

⁴⁶ The access permissions for the Transfer Folders only allowed the sending party to write and read and the receiving party to only read (and copy). All content in these folders is retained and a detailed log of documents, data, and information that has been transferred is maintained at Credit Suisse in Switzerland.

⁴⁷ Arthur Andersen, Credit Suisse Group – Final Report on The Second Phase Forensic Accounting Investigation, Part A, 1999, page 52.

⁴⁸ Arthur Andersen, Credit Suisse Group – Final Report on The Second Phase Forensic Accounting Investigation, Part A, 1999.

- (87) The setup of the Investigation Workspace ensured that all review results, audit logs, and work products were secured, reproduceable and consistently archived.

2.2 Forensic Investigation Methodology

- (88) To determine whether Credit Suisse predecessor banks in Switzerland maintained Accounts held by Search Persons, we searched and reviewed documents dating back over 70 years. We first worked with Credit Suisse archive and system experts to identify the relevant document repositories and recordkeeping systems, and to define the search and collection protocols for these sources. An overview of the available physical and electronic Bank client records is provided in *Chapter 3*.
- (89) Based on our assessment, we then developed an **Investigation Methodology** consisting of (i) the **Investigation Data Management and Processing**, and (ii) the **Review Approach**.
- (90) The Investigation Data Management and Processing covered the technical aspects of the Investigation, including (i) Name Matching, (ii) Data Processing, (iii) Document Request Management, and (iv) Review Management. The Investigation Data Management and Processing is described in *Chapter 4*.
- (91) Following the Name Matching and processing of data and documents, we performed a comprehensive, multi-step review of the relevant identified information using the Review Platform. The Review Approach is described in *Chapter 5*.

2.3 Investigation progress reports

- (92) Together with Credit Suisse and Homburger, we agreed on the project governance, required cooperation by the Bank, and the Investigation progress management and reporting.
- (93) Credit Suisse established a project manager and a PMO for the Investigation. They were responsible for managing our interaction with the Bank, ensuring the timely delivery of document and data requests, enabling efficient information exchange between the different parties involved, organizing meetings with required Bank expert resources (e.g., archive experts), and running the project management for the Investigation on behalf of Credit Suisse.
- (94) We provided progress updates and interim results to Homburger and Credit Suisse during regular project management update meetings.

**PHYSICAL AND ELECTRONIC
BANK CLIENT RECORDS**

3 Physical and Electronic Bank Client Records

- (95) For our Investigation we had to identify the relevant data sources, in particular, for historical Bank documents related to the NS Period. To support this process, we worked with Bank specialists responsible for the Bank’s Central Corporate Archive, referred to as CCA, and the Physical Records Archive, referred to as PRA. The CCA and PRA are described in further detail in the *Chapter 3.4.1* and *Chapter 3.4.2*, respectively.
- (96) We also analyzed and assessed, together with the Bank’s subject matter experts, the Bank’s current and historical recordkeeping systems to identify potentially relevant client information.
- (97) This Chapter provides an overview of the (i) types of information recorded over time, (ii) available databases that can be electronically searched for specific names, (iii) archives where electronic images are stored, (iv) physical archives of Credit Suisse, and (v) the archive created by Arthur Andersen during their investigation in the 1990s.

3.1 Available client and transaction information

- (98) Since the 1930s, Credit Suisse has substantially increased the quantity and type of information it records about its clients. The volume of client and Account information captured has significantly increased over time given the growth of the client base of Credit Suisse, the implementation of IT systems, and the regulatory requirements imposed on Swiss banks.
- (99) In the early 20th century, handwritten Account registry cards and Bank ledgers were the primary records for a Bank client's Account. They contained the client's name and, in some cases, a high-level domicile, the different types of Accounts the client had (such as savings Accounts, safety deposit boxes, or securities Accounts), and the dates when the Account was opened and closed.

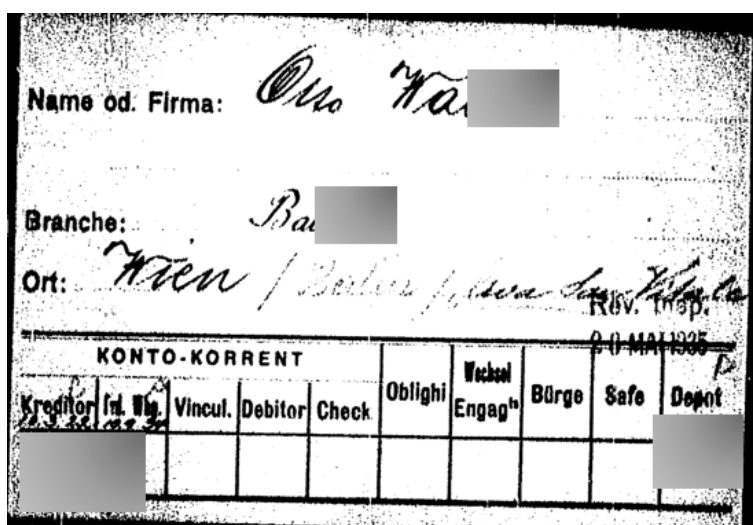


Figure 7: Exemplary SKA Account registry around 1930

(100) Starting around 1950, the use of typewriters, instead of handwriting, became more common to document Account registry cards and other Bank documents. Typical Account registry cards of this time also started to contain more information, such as the client's date of birth, a more detailed address, and their nationality. However, they generally did not include any details about the client's transactions or fund transfers.

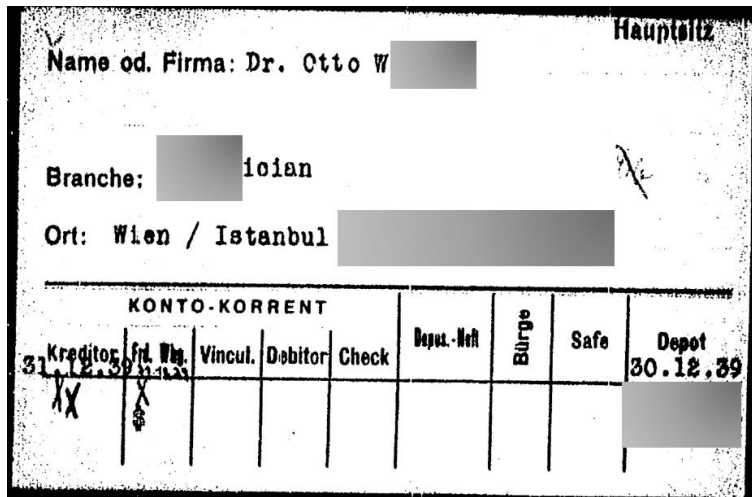


Figure 8: Exemplary SKA Account registry card for the period around 1940

(101) Detailed asset and transaction information (e.g., Account statements, information on originators and beneficiaries of transactions) is generally not available in the surviving documents for the period before 1970.

(102) The Bank's branches kept local ledger information called the "Depositenheft", which listed the balance of each Account on a specific date. These ledgers were handwritten and usually not arranged by client, but rather in chronological order. Although they may have contained some additional details about the Account balances of the branch's clients, the information was of limited use for our Investigation due to the way it was recorded. Clients were often identified by only their first initial and last name, or with vague additional information, which made it difficult to match an entry to a specific Search Person.

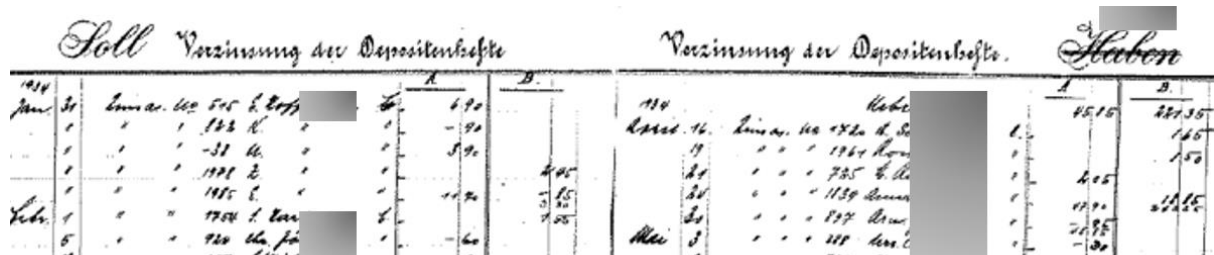


Figure 9: Exemplary extract of handwritten ledger (Depositenheft) for a branch before 1945

(103) For the main branch of SKA (Hauptsitz) the Bank maintained additional information for security Accounts, typically recording the client's purchases and sales of securities in a "Depot Card" that was associated with a "Depot Account". A Depot Card contained details about a client's transactions related to a specific security.

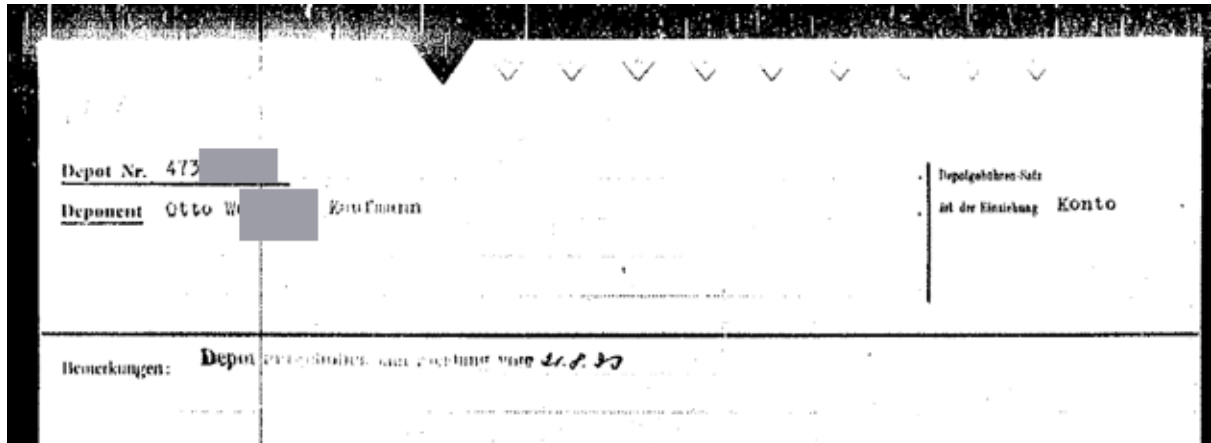


Figure 10: Exemplary Depot Card

(104) Starting in 1973, Credit Suisse introduced the first electronic systems to record information on Banking Relationships active at the time. Modern rules and regulations regarding documentation obligations only developed around the same time. The Bank’s modern client management systems have been designed to fulfill heightened regulatory requirements and consistently capture detailed information about the account holder, the beneficial owners, the power of attorney holder, and the history of the asset information.



Figure 11: Exemplary screenshot of CIF Host, the Bank’s electronic client management system

3.2 Data Pools with Bank Client Records

(105) One of the key elements of our Investigation was to search the names of Search Persons across identified relevant recordkeeping systems. This process is referred to as Name Matching and is explained in more detail in Chapter 4.1.

(106) The Name Matching was conducted on electronic databases that contain records of client names, referred to as Data Pools. We considered existing Data Pools with relevant historical closed, dormant, and current Account information for our Investigation. Additionally, two Data Pools were specifically created in response to our request. Based on an in-depth assessment, we selected the relevant Data Pools for the Investigation and identified certain Data Pools available in SAMatching that we did not consider because they were unlikely to contain relevant client information (see *Chapter 3.2.4*).⁴⁹

3.2.1 Historical Account Information

(107) While certain records have not been retained by Credit Suisse due to the passage of time, the Bank and the former accounting firm, Arthur Andersen, on behalf of the ICEP, undertook significant efforts in the 1990s to collect, image, and archive a significant number of documents for the pre-war, wartime, and post-war periods of the Second World War. Among other things, these endeavors led to the development of different historical electronic databases for dormant and inactive Accounts, which contain the names of Bank clients and are available as Data Pools in SAMatching that can be electronically searched.

(108) Relevant historical Bank client records considered for our Investigation include the Data Pools described in *Table 3*:⁵⁰

Name of the Data Pool	Number of Entries
ARCH GR exSKA 1933-1995	2,641,435
ARCH GR exSVB Region Zuerich	187,875
ARCH Depotvaloren-Karten exSKA HS 1930-1950	41,523
IPD FORMSEC ANOME	334,086
ARCH GH62-Kundenarchiv	7,017,354
ARCH ZFA Kundendaten	253,811
ARCH Rechtsdienstkartei	75,514
ARCH Verrechnungsstelle Deutschland	9,277
ARCH Verrechnungsstelle USA	2,017
ARCH Collective Accounts OP-GHD	20,444
ARCH GHDE-Ombudsmann	6,055
ARCH GHFC-Nachforschungen	2,799
ARCH GHDE-Nachforschungen	4,469

Table 3: Overview of Data Pools with historical Account information

- *ARCH GR exSKA 1933-1995*: Data Pool with Bank client records for SKA Account registry cards between 1933 and 1994. The collection includes ~2.3 million Account registry cards from the headquarter and branches.

⁴⁹ SAMatching is a tool used in the business-as-usual process of the Bank and certain Data Pools are linked to the live systems of the Bank. As a result, the number of Data Pools and entries in each Data Pool may change. Technical details on the analysis and assessment, as of January 7, 2022, are documented in working documents stored at Credit Suisse in Switzerland.

⁵⁰ Number of entries as of January 7, 2022.

- *ARCH GR exSVB Region Zuerich*: Data Pool with Bank client records for SVB Account registry cards for the Zurich region, including SVB data from IRIS, SVB's client management system, until 1995.
- *ARCH Depotvaloren-Karten exSKA HS 1930-1950*: Data Pool with Bank client records for SKA Depot Cards at the headquarters between 1933 and 1950.
- *IPD FORMSEC ANOME*: Data Pool with Bank client records for numbered and pseudonym Accounts closed before 1986, as recorded on the numbered Account index cards.
- *ARCH GH62-Kundenarchiv*: Data Pool with Bank client records for documents archived in the 1990s in the Bank's physical archive at Giesshuebelstrasse 62 in Zurich. The documents at Giesshuebelstrasse 62 primarily included client records for the period from around 1900 to 1998.
- *ARCH ZFA Kundendaten*: Data Pool with Bank client records for documents from the CCA that were manually indexed (see *Chapter 3.4.1*). This Data Pool also contains other records for non-Credit Suisse clients contained in documents processed from the CCA (e.g., external lists such as the SWC List).
- *ARCH Rechtsdienstkartei*: Data Pool with Bank client records for index cards of SKA legal cases for the period around 1930 to 1985. The underlying legal files are typically retained in the CCA or PRA.
- *ARCH Verrechnungsstelle Deutschland*: Data Pool with Bank client records reported to the Swiss Clearing Office in connection with the blocking and release of German assets towards the end of the Second World War.
- *ARCH Verrechnungsstelle USA*: Data Pool with Bank client records in connection with the blocking and release of Swiss assets by the United States.
- *ARCH Collective Accounts OP-GHD*: Data Pool with Bank client records recorded by the Dormant Accounts team in a database to identify and track dormant and contact-less clients with small amounts booked on collective Accounts.
- *ARCH GHDE-Ombudsmann*: Data Pool with Bank client records recorded in a database to track requests from the Swiss banking Ombudsperson to Credit Suisse in relation to dormant assets.⁵¹ The Data Pool also contains records for non-Credit Suisse clients provided to Credit Suisse following a request placed with the Swiss banking Ombudsperson.

⁵¹ The Swiss Banking Ombudsman acts as an information and mediation center without jurisdictional authority for clients of member institutions of the Swiss Bankers Association. He deals with questions and complaints concerning banking and financial services carried out by the member institutions.

The Swiss Banking Ombudsman also runs a Central Claims Office for people searching for assets without contact and dormant assets (dormant accounts) in Swiss banks.

- *ARCH GHFC-Nachforschungen / ARCH GHDE-Nachforschungen*: Two Data Pools with Bank client records recorded in a database to track search requests related to dormant Accounts triggered by the Bank's legal department, Prof. Jung, or Credit Suisse management in the period around 1997 to 2002. The Data Pools also contains records for non-Credit Suisse clients for which a search request was triggered (e.g., when Prof. Jung conducted his research on the SWC List).

3.2.2 Current Account Information

- (109) In addition to the historical data sources, the Bank also maintains modern IT systems with detailed Bank client records for current Accounts.
- (110) Relevant Bank client records for current Accounts considered for our Investigation include the Data Pools in *Table 4*:⁵²

Name of the Data Pool	Number of Entries
CH CS CIF (<i>active Accounts as of 2013</i>)	6,463,403
CH CS CIF Archive (<i>Accounts inactive as of 2013</i>)	3,498,836
CH CS Partners	1,523,853
CH CS BM (<i>active Accounts as of 2013</i>)	5,079,055
CH CS BM Archive 1 (<i>Accounts inactive as of 2013</i>)	4,066,294
CH CS BM Archive 2 (<i>Accounts inactive as of 2013</i>)	3,158,635

Table 4: Overview of Data Pools with current Account information

- *CH CS CIF / CH CS CIF Archive*: Two Data Pools with Bank client records for account holders in the electronic application for client master data on the Credit Suisse Swiss Banking IT Platform (SBIP) ("**CIF Host**", CIF being an acronym for Client Information File). CIF Host includes Accounts that were active when the processor system of CIF Host was introduced in 1973.
- *CH CS Partners*: Data Pool with Bank client records for beneficial owners of Accounts recorded in CIF Host, if different than the account holder, and account holder of numbered Accounts, including inactive Accounts.
- *CH CS BM / CH CS BM Archive 1 / CH CS BM Archive 2*: Three Data Pools with Bank client records for power of attorney holders on Accounts recorded in CIF Host, if different than the account holder.

3.2.3 Data Pools created for our Investigation

- (111) The Bank created two Data Pools in SAMatching in response to our request for the Investigation (see *Table 5*):⁵³

⁵² Number of entries as of January 7, 2022.

⁵³ Number of entries as of January 7, 2022.

Name of the Data Pool	Number of Entries
INT CH FILENET	8,336,144
CH ARCHIVE AA SKA	893,618

Table 5: Overview of Data Pools created for our Investigation

- *INT CH FILENET*: Data Pool with Bank client records of the electronic Image Archive, sometimes referred to as FileNet, of Credit Suisse. As such, the Data Pool contains Bank client records with metadata for documents that are electronically available at Credit Suisse. The electronic Image Archive is explained in more detail in *Chapter 3.3*.
- *CH ARCHIVE AA SKA*: Data Pool with Bank client records of the electronic accounts database independently created by Arthur Andersen in the 1990s. Arthur Andersen concluded in its final report to ICEP that the database covers ~95% of Account names at SKA for the period 1933 to 1945.⁵⁴ The Arthur Andersen Archive and the electronic accounts database are explained in more detail in *Chapter 3.5*.

3.2.4 Data Pools not considered for our Investigation

(112) At the time of our assessment, SAMatching contained 286 Data Pools. Based on an in-depth assessment, we selected 21 relevant Data Pools for the Investigation, as described above in *Chapter 3.2.1*, *Chapter 3.2.2*, and *Chapter 3.2.3*, respectively.

(113) For the remaining 265 Data Pools we determined, based on our assessment, that they were unlikely to have relevant client information and we did not consider them for Name Matching.⁵⁵

- 27 Data Pools do not contain any entries.
- 77 Data Pools do not contain any Bank client records (e.g., external lists such as World Check used for sanctions screening, employee data, vendor and supplier lists).
- 8 Data Pools contain redundant data to Data Pools considered for the Investigation.
- 36 Data Pools have been created for ad-hoc searches with SAMatching or remediation actions by the Bank.
- 54 Data Pools contain data considered irrelevant for the Investigation based on the products and/or services they cover (e.g., Investment Banking, Digital Banking, Credit Cards, Trade Finance, Leading, Private Equity, CS Trust).

⁵⁴ Arthur Andersen, Credit Suisse Group – Final Report on The Second Phase Forensic Accounting Investigation, Part A, 1999, page 3.

⁵⁵ SAMatching is a tool used in the business-as-usual process of the Bank and certain Data Pools linked to live systems of the Bank are automatically updated.

- 63 Data Pools contain data considered irrelevant for the Investigation based on the time period and geography they cover (e.g., Asia Pacific, Middle East, data related to entities established after 1990).

3.3 Electronic image archive

(114) As explained, the Bank and the former accounting firm, Arthur Andersen, on behalf of the ICEP, undertook significant efforts in the 1990s to collect, image, and archive a large number of documents for the pre-war, wartime, and post-war periods of the Second World War. This collection not only resulted in the creation of electronic archive indexes and the creation of Bank client records in the historical recordkeeping systems, but also included a major exercise to scan relevant historical Bank client documents.

(115) In addition to the historical documents, the Bank also maintains electronic versions of Bank client documents for closed and current Accounts (e.g., Account opening forms, signatory forms, beneficial owner forms, and client correspondence).

(116) In 1991, SKA introduced a centralized electronic archiving function. The electronic versions of the historical and current Bank client documents are stored in this system, which is based on two underlying technology platforms:

- The Swiss Electronic Records Archive ("**ELAR**"), introduced in 1991 as the electronic archiving tool for the Credit Suisse mainframe. ELAR contains the metadata of the system and is primarily fed by CIF Host.
- The **Image Archive**, also referred to as FileNet, which contains the scanned documents related to the metadata from ELAR.

(117) For Accounts that were open or opened after 1994, the Bank can usually produce the electronically available documents related to a specific Account in one file ("**eBinder**"). An eBinder typically includes the summary of available electronic documents (e.g., Account opening forms, client correspondence, and Account statements).

3.4 Physical Credit Suisse archives

3.4.1 Central Corporate Archive

(118) The Central Corporate Archive, referred to as **CCA**, is responsible for permanently archiving physical and electronic Credit Suisse Group-relevant documents produced by any of the Credit Suisse Group companies. Typical records include minutes of Board of Directors and the Executive Board meetings, annual reports, or audit reports.

(119) According to the Bank, the CCA contains 5,381 record series, or sets of records, for the period 1933-1945, amounting to ~24,000 archive units (e.g., boxes or folder), estimated to be around 2,400 to 3,000 running meters of documents.



Figure 12: Example of archival boxes in the CCA

- (120) Generally, the CCA does not hold Bank client information. Documents may occasionally contain Bank client data because individual client names or business activities of individuals are mentioned in corporate documents, e.g., in Board of Directors meeting minutes. Also, a number of Bank client records for pre-1945 Accounts were initially transferred to the CCA during the initial phase of the centralization process, which were subsequently not passed on to the Physical Records Archive, referred to as **PRA** (see *Chapter 3.4.2*).
- (121) We conducted dedicated quality assurance activities to assess whether relevant documents with Bank client-identifying information are contained in the CCA that have not previously been identified with electronic search. The activities are described in *Chapter 9.2.1*.
- (122) The CCA uses scopeArchive ("**ScopeArchive**"), a commercial standard product, to manage the archive. The ScopeArchive contains metadata only and does not contain any images. The information stored in ScopeArchive for each series of records include the name, the originating source, the approximate time span, the processing status, the archive plan number ("**APN**"), and additional location information.

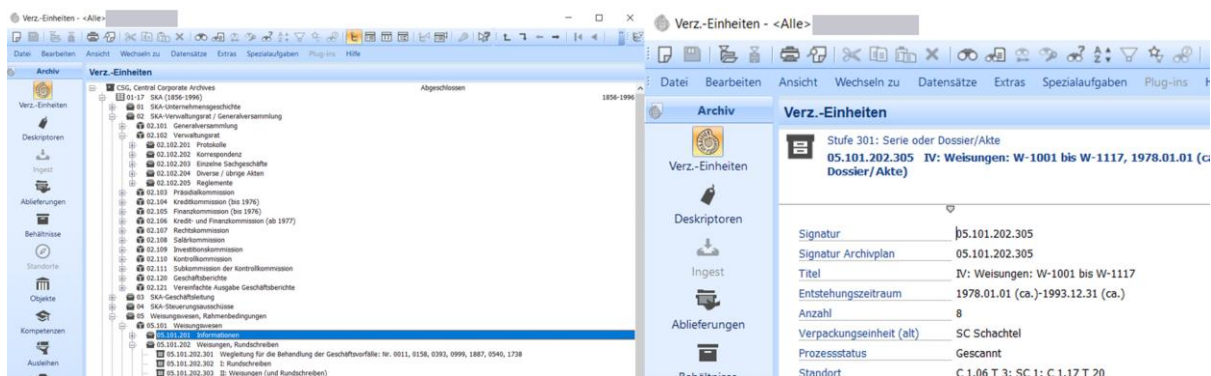


Figure 13: Screenshot from the Bank's ScopeArchive

- (123) If scanned documents are available, which is indicated in the processing status in ScopeArchive, they are stored in the CCA's electronic system, **ImageArchive ZFA**. Documents considered important from a CCA's perspective have been scanned and are electronically available. These documents are typically not relevant for our Investigation. Approximately 1,000 record series, i.e., sets of records, out of the ~65,000 record series in the CCA are available in the ImageArchive ZFA.
- (124) If Documents are not available in scanned format, the physical files need to be manually identified by archive specialists based on the location information documented in ScopeArchive.
- (125) Electronic searches can be run on Bank client names in the description of record series on a case-by-case basis in the ScopeArchive and the ImageArchive ZFA, where electronic full-text searches for Bank client names can be run on the around 1,000 record series that are digitally available.
- (126) The CCA also has access to the **Client Master Data Database** that contains records of ~370,000 individual and company names that were manually recorded in this database in the 1990s from a variety of documents pertaining to the period 1930 to 1950 to facilitate future electronic searches. A cleansed version of the Client Master Data Database is also contained in SAMatching as the Data Pool *ARCH ZFA-Kundendaten* and was considered for our Investigation.

3.4.2 Physical Records Archive

- (127) The Physical Records Archive, **PRA**, holds physical business and Bank client-related documents for the statutory retention periods and legal holds.



Figure 14: Example of archival boxes in the PRA

- (128) According to the Bank, the PRA contains around 16 running meters of documents for the period 1933-1945.
- (129) During the centralization activities in the 1990s, Credit Suisse made significant efforts to scan documents and index the Bank client names in an electronic database to enable searchability.

The collection of metadata at the time was focused on the First Name, Last Name, the reference to the physical record via APN, and the reference to the electronic image, if available.

- (130) The indexed names in the databases are included in the searchable Data Pools and were used for Name Matching. The associated images are preserved in the Image Archive.

3.4.3 Document destruction by the Bank

- (131) Based on information provided by Credit Suisse, Swiss law requires Swiss banks to retain documents for a period of 10 years. As an exception, a 1996 Swiss Federal Decree prohibited the destruction of documents with potential relevance for the Bergier Commission through 2001.

Credit Suisse had historically applied a routine document destruction process that excluded historically significant records beyond the period determined by the Federal Decree.

- (132) In 2016 and 2017, the Bank undertook a systematic destruction of more than one million physical archive boxes and ~10 million microfiches, which no longer needed to be retained based on Swiss law, Bank policy, or legal hold requirements. These systematic efforts included the destruction of more than 9,000 physical archive boxes related to the period prior to 1981.
- (133) According to Credit Suisse, its document destruction efforts systematically excluded the destruction of files located in the CCA, as well as of files related to numbered and pseudonym Accounts, which had been stored in the PRA. Furthermore, the destruction of physical records did not impair the Bank's ability to retrieve Account information where such information had previously been made available electronically.

3.4.4 ANOME Archive

- (134) Credit Suisse maintains a separate physical archive for historical numbered and pseudonym Accounts, referred to as the **ANOME Archive**. The ANOME Archive is administrated by the PRA team but is physically separated from other documents in the PRA.
- (135) The ANOME Archive contains the physical documents related to historical numbered and pseudonym Accounts closed before 1987 and it was not in the scope of the document destruction processes in 2016. The ANOME Archive amounts to ~200 running meters of archived documents.



Figure 15: Example of archival boxes in the ANOME Archive

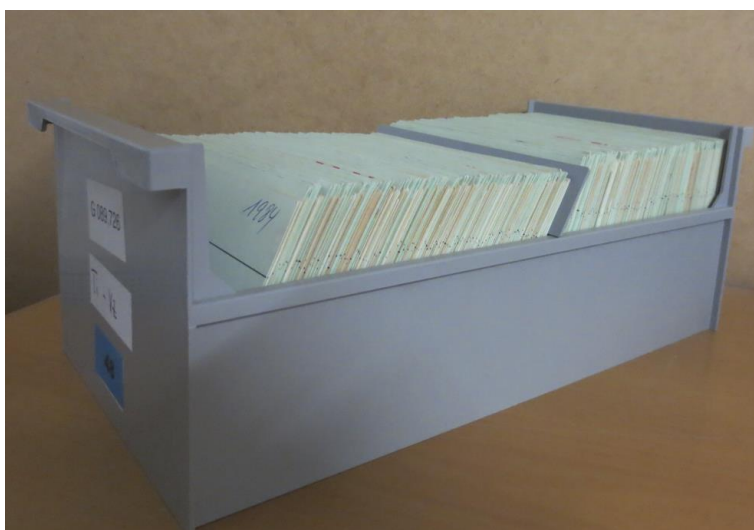


Figure 16: Example of ANOME index cards

- (136) The Bank client records of Accounts stored in the ANOME Archive were captured in the 1990s in an electronic database to enable searchability. The records in the database are included in the searchable Data Pools and were used for Name Matching.

3.4.5 Prof. Jung Archive

- (137) Starting in 1996, Credit Suisse conducted internal historical research, led by Prof. Jung, into the bank's business activities in the temporal context of the NS regime. In 2001, Prof. Jung published the results of his research in the book *Zwischen Bundeshaus und Paradeplatz – Die Banken der Credit Suisse Group im Zweiten Weltkrieg*.⁵⁶

⁵⁶ Prof. Dr. Joseph Jung, *Zwischen Bundeshaus und Paradeplatz – Die Banken der Credit Suisse Group im Zweiten Weltkrieg*, Neue Züricher Zeitung Publishing, 2001; Prof. Dr. Joseph Jung, *Credit Suisse Group Banks in the Second World War: A Critical Review*, Neue Züricher Zeitung Publishing, 2002.

- (138) Prof. Jung's efforts, which are described in *Chapter 7.4*, resulted in an additional collection of documents. Prof. Jung's physical working papers are stored in a separate section of the CCA and the documentation regarding his historical research into Second World War-related questions amounts to ~65 running meters of documents.
- (139) The most important documents within these working papers include the research binders, i.e., the collection of identified documents related to the researched SWC Persons, referred to as the **Prof. Jung Binders**.
- (140) The most relevant documents for our Investigation, including the Prof. Jung Reference Documents, were scanned and provided to us electronically.

3.5 Arthur Andersen Archive

- (141) In the 1990s, the ICEP, which investigated Accounts at Swiss banks belonging to victims of Nazi persecution, retained accounting firms to conduct forensic investigations of Accounts at many Swiss banks.^{57,58} While Arthur Andersen's focus was on victim assets, the independent data collection of historical Account information was targeted at still available documents for Accounts that were open or opened during the period 1933 to 1945.⁵⁹
- (142) Arthur Andersen worked in parallel with Credit Suisse, which had already started the centralization process of physical archives as described in *Chapter 3.4.1*. Arthur Andersen also conducted branch visits to assess whether all relevant archival material had been identified and was considered for centralization.
- (143) Arthur Andersen built a separate archive of the physical documents it collected, referred to as **Arthur Andersen Archive**. Arthur Andersen also stored the relevant findings from their investigation, selected working files, historical information collected from third parties, and their reports in the Arthur Andersen Archive.
- (144) The Arthur Andersen Archive is located on the premises of Credit Suisse at Thurgauerstrasse 119, 8152 Opfikon, Switzerland, and was not affected by the document destruction process described in *Chapter 3.4.2*.
- (145) Arthur Andersen used for its work a dedicated server, which is physically located in the Arthur Andersen Archive ("**Arthur Andersen Server**").
- (146) In February 2021, under our supervision, an independent third-party service provider created a digital forensic image of the content from the original Arthur Andersen Server.

⁵⁷ The Independent Committee of Eminent Persons, Report on Dormant Accounts of Victims of Nazi Persecution in Swiss Banks, 1999, http://icep-iaep.org/final_report/ICEP_Report_english.pdf, (last accessed on February 28, 2023).

⁵⁸ The Independent Committee of Eminent Persons, Report of the Independent Committee of Eminent Persons; Annex 2, 1999, https://www.crt-ii.org/ICEP/ICEP_Report_Annexes_1-9.pdf, (last accessed on February 28, 2023).

⁵⁹ Arthur Andersen, Credit Suisse Group – Final Report on The Second Phase Forensic Accounting Investigation, Part A, July 12, 1999, page 52.

We restored the forensic copy in the Investigation Workspace and extracted the relevant information for our Investigation.

- (147) Arthur Andersen created a database to record the information it had collected during the centralization process ("**Arthur Andersen Database**"). The Arthur Andersen Database contains records for about 1.1 million Accounts and names of ~856,000 clients. Arthur Andersen concluded in its final report to ICEP that the Arthur Andersen Database covers ~95% of Account names at SKA for the period 1933 to 1945.⁶⁰ The Arthur Andersen Database was included in SAMatching as a separate Data Pool for Name Matching and was considered for our Investigation.
- (148) Arthur Andersen also stored electronic images of documents on the Arthur Andersen Server that it determined were likely to contain Bank client records from 1933 to 1945. These electronic images were reviewed in case of a Hit on the Arthur Andersen Database.
- (149) The Arthur Andersen Archive and the Arthur Andersen Server are important repositories and data sources to which we had complete access for our Investigation. We conducted dedicated quality assurance activities in relation to the Arthur Andersen Archive and the Arthur Andersen Server, which are described in *Chapter 9.2.2*.

⁶⁰ Arthur Andersen, Credit Suisse Group – Final Report on The Second Phase Forensic Accounting Investigation, Part A, July 12, 1999, page 3.

**INVESTIGATION DATA
PROCESSING AND
MANAGEMENT**

4 Investigation Data Processing and Management

(150) The Investigation Data Management and Processing covered the technical aspects of the Investigation, including (i) Name Matching, (ii) Data Processing, (iii) Document Request Management, and (iv) Review Management.

4.1 Name Matching

(151) One of the key elements of our Investigation was to search the names of Search Persons across identified relevant physical and electronic Bank client records, referred to as **Name Matching**.

4.1.1 Selection and parametrization of the Name Matching tool

(152) In the initial phase of the Investigation, we assessed different Name Matching options, including Name Matching tools operated by Credit Suisse and publicly available matching algorithms based on Levenshtein distances for the specific purpose of the Investigation. Based on our assessment we decided to use the Bank internal proprietary Name Matching tool SAMatching. SAMatching applies a fuzzy matching algorithm and is widely used in the Bank, among other things, for the sanctions screening of client-related parties against sanctions lists. SAMatching is regularly benchmarked by the SWIFT Peer assessment against other commercial products with strong results. The SWIFT Peer assessment is accepted as an industry standard by regulators to benchmark sanction name screening solutions.

(153) We held multiple walkthrough and deep dive sessions with the Bank experts to understand fully, define, and test the Name Matching process established for the Investigation. Credit Suisse granted us direct access to the SAMatching application owner to define the search parameters and ensure the relevant Bank data sources, referred to as Data Pools, were selected and considered. The selection of the relevant Data Pools for the Name Matching was independently made by AlixPartners after comprehensive testing as explained in *Chapter 3.2*.

(154) We also conducted a pilot Name Matching to assess the appropriate fuzzy matching accuracy level to be applied. For illustration purposes:

- if the name on the Name List is *Michael Bacher* and the name *Michael Bacher* is contained in any Data Pool selected for the Name Matching, the resulting Name Matching score is 100% - an **Identical Name Match**.
- If there is a deviation between the name on the Name List and the name contained in the Data Pool, the Name Matching score decreases.

For example, if the name on the Name List is *Michael Bacher* and the name contained in the Data Pool is *Michael Bachler* or *Michael Lukas Bucher*, the Name Matching score is 93%. If the name contained in the Data Pool is *Michael B.*, the Name Matching score decreases to 80%.

- (155) Based on the results of the pilot Name Matching (*Michael B.* may potentially be the searched person *Michael Bacher*), we decided to set the fuzzy matching accuracy level for the Investigation at 80%, which is the lowest supported threshold in SAMatching for bulk searches, resulting in the largest number of results.
- (156) During the testing we also identified certain shortcomings in the detection of complex names, including multiple titles, concatenated names or initials. Based on these findings we decided that the Name Lists would need to be enhanced with **Name Variants** of these complex names to improve the effectiveness of the Name Matching. This process is described in *Chapter 6.2* for the Argentine Lists and *Chapter 7.2* for the SWC List.

4.1.2 Preparation of name lists

- (157) The identification of UAG List, Argentine NSDAP List, and SWC List sources, the digitization efforts, and the related analysis of the specific lists is described in *Chapter 6* for the Argentine Lists and *Chapter 7* for the SWC List.
- (158) From a technical perspective, the SAMatching application owner supported us in defining an efficient and accurate structure for the Name Lists to achieve the best Name Matching results. An extract of this format is shown in *Figure 17*.

ID#	REVIEW_Número	REVIEW_Fecha de Nacimiento (YYYY-MM-)	REVIEW_Ingreso (YYYY-MM-DD)	Distrito	REVIEW_full name (Suffix, last name, Prefix, first name middle name, title)	REVIEW_title	Search_First_Name	Search_Last_Name
1	5492	1892-03-31	1937-08-01	Florida	Althoff, Franz		Franz	Althoff
1a	5492	1892-03-31	1937-08-01	Florida	Althoff, Francisco		Francisco	Althoff
2	3897	1898-05-03	1937-02-01	Florida	Apfelböck, Johann		Johann	Apfelböck
2a	3897	1898-05-03	1937-02-01	Florida	Apfelböck, Juan		Juan	Apfelböck
2b	3897	1898-05-03	1937-02-01	Florida	Apfelboeck, Johann		Johann	Apfelboeck
2c	3897	1898-05-03	1937-02-01	Florida	Apfelboeck, Juan		Juan	Apfelboeck
3	7903	1891-03-24	1940-07-01	Florida	Auschrat, Bruno		Bruno	Auschrat
4	3898	1901-05-07	1935-12-01	Florida	Bähr, Erich		Erich	Bähr
4a	3898	1901-05-07	1935-12-01	Florida	Bähr, Erik		Erik	Bähr
4b	3898	1901-05-07	1935-12-01	Florida	Baehr, Erich		Erich	Baehr
4c	3898	1901-05-07	1935-12-01	Florida	Baehr, Erik		Erik	Baehr

Figure 17: Extract of the Name Lists provided to the Bank for Name Matching

- (159) These Name Lists were prepared by us for each Name Matching cycle for Search Persons and was provided to the SAMatching application owner via Transfer Folder in different waves. The Name Lists, including the date when they were submitted for Name Matching, are available at Credit Suisse in Switzerland.

4.1.3 Name Matching process

- (160) Under the guidance of AlixPartners, Credit Suisse experts conducted the Name Matching and exported the results as structured data in Excel files to AlixPartners via Transfer Folder. The format of these files was previously agreed between AlixPartners and Credit Suisse.
- (161) Each row in the Excel file refers to a reference data record in SAMatching. Each row is referred to as a **Hit**. A Hit occurs when, based on the SAMatching's fuzzy logic algorithm, a name on the Name Lists matches a name entry contained in a Data Pool. A name is typically contained in a specific Data Pool if the name appears on a document that relates to the scope of the Data Pool.

By way of example, an SKA registry card of a fictitious client *Franz Althoff* with Account opening date 1943 is typically recorded in the Data Pool *ARCH GR exSKA 1935-1995* with the name *Franz Althoff*. A record of the Swiss Clearing Office that contains the name of a fictitious client *F. Althoff* is typically recorded in the Data Pool *ARCH Verrechnungsstelle Deutschland* with the name *F. Althoff*.

- (162) The resulting Excel files were provided to us on the Transfer Folder and loaded to the Investigation Workspace for further processing by AlixPartners.

4.2 Data processing

- (163) We technically validated the data provided for the Hits to identify and address potential technical issues, such as special characters, different format of dates, information that is recorded in the wrong data field, or default entries in empty data fields. For example, in certain Data Pools the date of birth data field was populated with the value *01/01/1900* for all Hits for which no date of birth was recorded because the date of birth field was a mandatory field to complete in the system when the data was captured. In other cases, characters such as *ñ* or *ü* were replaced in the Data Pool with *?* or other special characters, due to character conversion in exports or migrations.
- (164) The validated Hits data was subsequently consolidated and de-duplicated to have a uniform overview of the structured result data, independent of the data source. These processes were executed with stored technical procedures to ensure consistency and reproducibility. The initially provided data for the Hits included duplicates because the Data Pools are overlapping in parts and the SAMatching creates a Hit on each Data Pool separately, if applicable.
- (165) Following the Name Matching, data validation, data consolidation, and data de-duplication, the resulting Hits were loaded into the Review Platform.

4.3 Document request management

- (166) The structured information resulting from the Name Matching typically included for each Hit a reference to (i) an electronically available underlying document stored in the Image Archive (referenced by an electronic link), or (ii) to the location of the underlying document in the physical archives of Credit Suisse (referenced by an APN), or (iii) to the electronically available underlying document on the Arthur Andersen Server (referenced by a LinkID).
- (167) One document can relate to multiple Hits. For example, if the same document contains the names of two individuals who are both on the Argentine Lists, SAMatching created two Hits that both have a reference to the same underlying document. For example, if *Franz Althoff* and *Johann Apfelböck* are both on the Argentine Lists and had a joint Account at the Bank, the Account opening document would contain both names and both names would be recorded in the Data Pool. SAMatching would create a Hit for *Franz Althoff* with a reference to the underlying Account opening document and would create a separate Hit for *Johann Apfelböck* with a reference to the same underlying Account opening document. The two Hits are not duplicates and would be separately listed in the Review Platform but the underlying document, the Account opening document, would be the same for both.

- (168) For all relevant Hits we requested the underlying documents from the Bank and documented these requests in log files and the Review Platform. The request was submitted per Excel file via Transfer Folder to the respective Credit Suisse expert teams, or we retrieved the document from the Arthur Andersen Server, if the Hit was on the Arthur Andersen Data Pool. The subsequent document productions by the Bank were loaded into the Review Platform.
- (169) We set up a dedicated document request process to track the status of the document requests and to ensure completeness of the document deliveries.

4.3.1 Image Archive

- (170) We provided the document requests for the Image Archive to Credit Suisse via Transfer Folder. The document request contained for each requested document the reference number with which the electronic document could be identified, retrieved, and produced to AlixPartners as a .jpg or .pdf file on the Transfer Folder.
- (171) We conducted walk-throughs and deep dive sessions with the experts from the Image Archive team to understand and assess the reliability of the search, as well as the collection and production process. Additionally, we conducted consistency tests by submitting selected document requests twice and compared the results provided to us.
- (172) We tracked the completeness of the production on a document-by-document basis by comparing the documents provided against the Excel files used for submitting the request.

4.3.2 Physical Credit Suisse archives

- (173) For Hits that refer with an APN to a document in the physical Credit Suisse archives, we provided document requests to Credit Suisse via Transfer Folder. The Excel files contained the name of the Name Matched individual and the APN as well as additional location information, if provided in the metadata. The experts from the CCA and PRA identified, scanned, and produced the documents as an electronic version in .jpg or .pdf format based on the APN and the name.
- (174) We conducted on-site walk-throughs and deep dive sessions with the experts from the CCA and PRA to understand and assess the effectiveness and reliability of the search, as well as the collection and production process. We also conducted a set of on-site sample tests in the physical archive for certain Credit Suisse branches and the ANOME archive to assess the effectiveness of the search, as well as the availability and production of documents in the CCA and PRA. The archive testing procedures and results are described in *Chapter 9.2*.
- (175) The CCA and PRA archivists also provided presentations and further material on the structure of the Credit Suisse physical archives, the historical data collection and retention activities, and, given their wealth of experience with historical Bank documents, helped us to better understand historical documents.

- (176) To cope with the volume of document requests, the Bank hired additional resources for the CCA and PRA to support the retrieval of physical documents in response to our requests. In addition to the requests based on the results of SAMatching, we also submitted specific follow-up archive research requests ("**Archive Research Requests**") in relation to potential Accounts that we identified during our review.
- (177) These Archive Research Requests were tracked on a document-by-document basis to ensure the accuracy and completeness of the archive team's responses. On several occasions we performed on-site quality assurance and completeness tests to verify that the archive team had identified and produced all relevant documents to us, e.g., from the ANOME archive or the *Rechtsdienst* files.
- (178) Further, we had regular status meetings with the leadership of the CCA and PRA to align on the progress and prioritization of our requests and to discuss specific questions in relation to documents and information identified.

4.3.3 Arthur Andersen Archive

- (179) For Hits with a reference to the Arthur Andersen Archive, we identified the electronic documents on the Arthur Andersen Server based on the reference ID directly available in our Investigation Workspace. In the event the document could not be identified on the Arthur Andersen Server, we searched for the document in the Arthur Andersen Archive.
- (180) The Arthur Andersen Archive is physically located on Credit Suisse's premises in Zurich, Switzerland. After the bankruptcy of Arthur Andersen in 2002, Homburger was appointed as the administrator of the Arthur Andersen Archive.
- (181) To physically access the Arthur Andersen Archive, a dedicated process was developed. We planned a visit to the Arthur Andersen Archive and asked Homburger to assist us in getting access to the Arthur Andersen Archive and observe our search and collection activities. To reasonably protect electronic and physical data against unauthorized or unlawful processing and accidental, unauthorized or unlawful loss, destruction, alteration, damage, disclosure or access, Homburger and AlixPartners established a Security Protocol on December 22, 2020 that applied to all visits to the Arthur Andersen Archive.
- (182) Physical documents retrieved from the Arthur Andersen Archive were locally scanned onto a secured USB flash drive. The flash drive was transferred to a dedicated location at Credit Suisse, accompanied by Credit Suisse, Homburger, and AlixPartners personnel, where the information on the flash drive was loaded onto the Transfer Folders and into the Investigation Workspace. The information was further processed in the Investigation Workspace by AlixPartners. The flash drive was returned to, and securely stored in, the Arthur Andersen Archive.

4.3.4 Irretrievable documents

- (183) The Name Matching resulted in ~26 million Hits and ~10.3 million potentially relevant Documents in the Review Platform after de-duplication. Overall, 99.95% of the referenced electronic or archive files were produced by the Bank when we submitted formal requests or when we had to identify them in the Arthur Andersen Archive.
- (184) For the Documents where the Bank could not produce the referenced files, we maintained a detailed log. We provided the Bank with follow-up requests to manually research the respective physical or electronic archives to either identify and produce the file or provide an explanation for the reference files that were not identifiable.
- (185) For Documents related to the Arthur Andersen Archive, we conducted the respective research ourselves.
- (186) For a total of 3,798 out of the ~10.3 million (0.04%) potentially relevant Documents, the Name Matching resulted in a Hit on metadata, but the referenced files could not be identified and produced after additional research. Because the referenced files could not be identified, we were not able to review them and decide whether the Hit was relevant.
- (187) The result of our analysis of the 3,798 irretrievable Documents is described below and is based on information provided by the Bank.
- (188) For 1,500 of the 3,798 Documents, the Hit was on a name in the Arthur Andersen Database for which no electronic files were identifiable on the Arthur Andersen Server and no physical location of documents in the Arthur Andersen Archive was provided.
- As explained in *Chapter 3.5*, Arthur Andersen created the Arthur Andersen Database with ~856,000 Account names which covered ~95% of Account names at SKA for the period 1933 to 1945 as reported to the ICEP.⁶¹ Arthur Andersen retained documents that were relevant to the scope of their investigation, which was focused on Accounts related to victims of Nazi prosecution.
- (189) For 1,242 of the 3,798 Documents, the referenced archive files for specific Data Pools in SAMatching could not be produced with the following explanation provided by the Bank:
- For the Data Pool *ARCH Collective Accounts OP* the related database was built in MS Access 2.0 and used by the Bank's Dormant Account team to identify and track dormant and contact-less clients (i.e., assets booked on collective Accounts). The MS Access 2.0 database contained the metadata of these entries but not underlying documents.

⁶¹ Credit Suisse Group – Final Report on The Second Phase Forensic Accounting Investigation, Part A, page 3, Arthur Andersen, 12 July 1999.

- For the Data Pool *ARCH GHFC-Nachforschungen / ARCH GHDE-Nachforschungen* the related databases were built in MS Access to track the search requests triggered by the Bank's legal department, Prof. Jung, or the Credit Suisse management. The MS Access 2.0 databases contained the metadata of these entries but not the underlying documents.
- For the Data Pool *ARCH GHDE-Ombudsmann* the related database was built in MS Access to track the requests from the Swiss banking Ombudsman to Credit Suisse in relation to dormant assets. The MS Access database contained the metadata of these entries but not the underlying documents.

(190) For 442 of the 3,798 Documents, the references in SAMatching (APNs) point to physical document locations of the archive file that were part of the planned and well-documented document destruction performed by the Bank in 2016 (see *Chapter 3.4.3*).

(191) For 235 of the 3,798 Documents, no references are recorded in SAMatching with the following explanation provided by the Bank:

- For selected Documents in the Data Pools *CH CS Partners / CH CS CIF* and *CH CS CIF Archive / CH CS BM* and *CH CS BM Archive 1* and *CH CS BM Archive 2*, no valid reference information (CIFNR) is recorded in SAMatching.
- For selected Documents in the Data Pool *ZFA Kundendaten* no reference information is recorded in SAMatching. The metadata indicates that the Hits relate to a name list of doctors in concentration camps (*Namensliste KZ-Aerzte*) that could not be produced by the Bank because the names were taken from a list published on the internet to support the work of the archivists, but they are not necessarily Bank clients. The public list was not archived and therefore has no reference number (APN) recorded in SAMatching.
- For selected Documents related to the SVB branch in Lugano and that were part of the Data Pool *FormSec ANOME*, no APN was recorded when the Documents were indexed in the 1990s and, therefore, no specific reference information is available in SAMatching. The affected Documents relate to boxes for which the metadata has been captured decentralized in Lugano, without an APN from the physical archives at the headquarter.

(192) For 379 of the 3,798 Documents, the reference in SAMatching provided insufficient or invalid information to locate the referenced files:

- An *unspecific reference* was recorded in SAMatching and the CCA and PRA experts were not able to locate the physical archive files.

The research of the CCA and PRA experts in these cases was performed with increased quality control (six-eyes principle applied by Credit Suisse archivists). The CCA and PRA experts reported that the insufficient information would, e.g., point to:

- a large records series (APN) without additional information to narrow down the location of the files within the records series, e.g., APN 08.105.201.302 consisting of 47 boxes with tens of thousands of individual files and no further information such as box number, title, or date of document.
- an incorrect recorded reference, e.g., "WP1E-Final" recorded as APN, while there are no APNs in this format.
- incomplete APN references, e.g., APN is recorded as "56.104" and there are 80 APNs starting with "56.104".
- wrongly coded reference for a different APN, e.g., "26.130.216.301 ???" recorded as APN. This APN was checked with increased quality control and did not contain the name of the Search Person. The additional metadata available in SAMatching, "???", suggests that the checked APN is not the correct one (the APN contains different content than indicated in SAMatching).
- A *corrupt electronic link* recorded in SAMatching that references to the Image Archive did not return a valid document but resulted in an error message. According to Bank experts, this is caused due to the multiple system migrations that occurred since the introduction of Image Archive.

4.4 Review management

(193) All produced Documents were loaded into the Review Platform and linked to the respective Hit.

(194) To facilitate an efficient and high-quality review of the Documents, we developed a dedicated Review Approach which is described in *Chapter 5*.

4.4.1 Review Platform Governance

(195) The Review Platform was administrated by dedicated AlixPartners Review Platform administrators. Only these administrators had access to the backend of the Review Platform and were able to make changes beyond the review of Documents.

(196) Every AlixPartners reviewer was assigned a specific user ID and key review activities in the Review Platform were logged. This ensured full transparency on review decisions and allowed us to conduct targeted follow-ups and quality assurance activities. A detailed Review Platform log exists at Credit Suisse in Switzerland.

(197) We assigned different roles to reviewers based on their seniority and experience. Depending on the assigned reviewer's role, the reviewer had certain *search*, *create*, and *edit* rights in the review process. The most senior reviewers were assigned senior reviewer roles and they dealt with the most complex cases. They also conducted quality assurance reviews.

(198) The Documents for review were assigned to the different reviewers in batches. A batch is a collection of a specified number of documents along a specific criterion - for our Investigation, this was typically the name of the Search Person ("**Review Batch**"). For example, a reviewer was assigned a batch with 250 Documents related to the Search Person *Franz Althoff*. If a review batch was assigned to a reviewer, the Documents in this review batch could not be assigned in parallel to another reviewer. This ensured that Documents were not reviewed twice, while at the same time it could be tracked that every Document was reviewed.

4.4.2 Document waterfall

(199) We assigned a specific review outcome to each Document. To do so, we implemented a categorization logic on a document-by-document level that followed a waterfall logic. For example, if a specific Document was tagged with three different criteria that applied, the Document was assigned the highest-ranking criteria in accordance with the Review Approach.

This allowed a mutually exclusive, collectively exhaustive, statistical overview of the review results and a dedicated categorization of each Document and the Search Person – the **Waterfall Statistic**.

(200) The Waterfall Statistic was created automatically on a daily basis and was used to report on the Investigation progress and assign review.

REVIEW APPROACH

5 Review Approach

(201) We performed a comprehensive, multi-step review of the relevant identified documents using the Review Platform. The complete review and investigation process, which is further detailed in this Chapter, has been managed, performed, and fully documented on the Review Platform. All Documents, as described in *Chapter 4.2*, were uploaded into the Review Platform for an effective review by AlixPartners.

(202) Our review consisted of five consecutive steps:



Figure 18: Overview of the Investigation's review steps

(203) In a first step, given that we asked the Bank to conduct the Name Matching and produce Documents across all defined Data Pools and without time restrictions, we had to implement processes to identify the Documents in the Review Platform that are potentially relevant to our Investigation and filter out obvious false positive Documents based on objective criteria ("**Automated Application of Exclusion Criteria**"), see *Chapter 5.1*. For example, we filtered out Documents outside the relevant time period or with inconsistent date of birth information, where available. This filtering had a significant impact because of the filtering of Accounts that were opened after the NS Period (~61% of the Documents for the Argentine Lists) and obvious false positive Documents related to Bank clients with a different date of birth (~28% of the Documents for the Argentine Lists), in particular for newer Accounts where the respective information was available.

(204) Subsequently, based on a manual review of Name-Combinations, referred to as **Manual Name-Combinations Review**, we identified combinations of identical (**Identical Name Match**) or similar names (**Name Similarity**) and filtered out Documents related to Bank client names that we manually identified as being different from the name of the respective Search Person (see *Chapter 5.2*).

(205) To prevent the exclusion of relevant information during these initial review steps, we implemented a special **Automated Protection Mechanism**. The protection applied to Documents with either a reference to Argentina by applying Argentina-related search terms and/or an Identical Name Match and close date of birth (see *Chapter 5.3*). Also, the reviewers were instructed to mark Documents "*For Further Investigation*" whenever they identified relevant information potentially linking a Document to a Search Person under review.

- (206) The first-level review, referred to as **First-Level Review**, was conducted on a Document content level focusing on the identification of potential identity matches with the respective Search Persons, the collection of relevant additional Account or Bank Person-related information contained in the Document, and the identification of obvious false positive Documents (see *Chapter 5.4*).
- (207) The second-level review, referred to as **Second-Level Review**, evaluated Documents identified in the First-Level Review to assemble an electronic file, referred to as **Bank Person File**, with all available Documents pertaining to the same Bank client, referred to as **Bank Person** (see *Chapter 5.5*).
- (208) Bank Person Files requiring an enhanced assessment or identified *For Further Investigation* were subject to an in-depth investigation, referred to as **Identity Investigation**. Leveraging additional internal and external data sources, the profiles of Search Persons and associated Bank Persons were enriched to establish a comprehensive fact base allowing for a categorization of the respective Search Person and the associated Bank Person File(s) (see *Chapter 5.6*).
- (209) The results of the reviews were comprehensively documented in the Review Platform. Summaries of our observations comprising all Bank Person Files and associated Search Person information were produced in presentation format ("**Case Binders**").
- (210) In addition to the application of a four-eyes principle for the First-Level Review and Second-Level Review, dedicated quality assurance activities complemented our review activities. Review-related quality assurance activities are described in *Chapter 9*. The implementation of our Review Approach for both the Argentine Lists and the SWC List is described in *Chapters 6 and 7*, respectively.

5.1 Automated Application of Exclusion Criteria

- (211) Given that we asked the Bank to conduct Name Matching and produce Documents across all defined Data Pools without time restrictions, we had to implement processes to identify the Documents in the Review Platform that were potentially relevant to our Investigation and filter out obvious false positive Documents.
- (212) To identify false positive Documents, we initially applied a set of pre-defined exclusion criteria to all Documents in the Review Platform ("**Exclusion Criteria**").
- (213) Bank client and Account-specific criteria were applied to available metadata to identify false positive Documents. Documents responsive to one or more of these Exclusion Criteria were filtered out and not processed for further review.⁶²
- (214) The Exclusion Criteria applied were slightly different for the Argentine Lists and the SWC List. The following criteria were used for the Argentine Lists:⁶³

⁶² The Documents were still considered for quality assurance reviews and as part of the Second-Level Review.

⁶³ See *Chapter 7.5.2* for the specific Exclusion Criteria applied for the SWC List.

- **Inconsistent date of birth** (i.e., if a Bank Person's date of birth, at the level of information available (i.e., day, month, or year), according to metadata, was identified as being inconsistent with the Search Person's date of birth information identified on the Argentine or SWC Lists, the Document was excluded)
- **Out of scope legal entity** (i.e., if a Document, according to metadata, was identified to relate to a non-SKA entity, the Document was excluded)
- **Out of scope time frame** (i.e., if a Document, according to metadata, was identified to relate to an Account closed prior to January 1, 1933, or opened after December 31, 1960,⁶⁴ the Document was excluded)
- **Disqualified domicile and/or nationality** (i.e., if a Document, according to metadata, was identified to relate to a Bank client domiciled in and / or hold the nationality of a country other than Argentina or a country belonging to the "Nazi Germany" as of 1941, the Document was excluded)⁶⁵
- **Accounts held by legal entities** (i.e., if a Bank client according to metadata was identified to be a legal entity, the Document was excluded)
- **Powers of attorney held after December 31, 1960⁶⁶** (i.e., if a Document, according to metadata, was identified to relate to a power of attorney role which started after December 31, 1960, the Document was excluded).

(215) Of the Exclusion Criteria listed above, "Inconsistent date of birth" and "Out of scope time frame" accounted for most Documents excluded. With respect to the Argentine Lists, almost 90% of Documents were excluded based on the Automated Application of Exclusion Criteria.

5.2 Manual Review of Name-Combinations

(216) For all Documents identified after the Automated Application of Exclusion Criteria, we subsequently performed a manual review of the distinct Name-Combinations identified in the Documents for the respective Search Person in comparison to the identified Bank Person Name-Combination. This review stage identified the Name-Combinations with Name Similarity, filtered out false positive Documents, and categorized the relevance of the Name-Combinations for each Search Person by manual review of the extracted Name-Combination information.

(217) Documents related to the following relevant Name-Combinations were identified as Name Similarity for further review:

⁶⁴ The time period from when the Nazi party took power in Germany until the year when the Swiss Clearing Office released the last German blocked assets.

⁶⁵ The countries that were part of "Nazi Germany" as of 1941 were Germany, Poland, Austria, Czech Republic, and Hungary.

⁶⁶ The year when the Swiss Clearing Office released the last German blocked assets.

- **Identical name** (e.g., Search Person name "*Elisabeth Müller*" and Bank Person name "*Elisabeth Müller*" or "*Elisabeth Mueller*" or "*Elisabeth Müller geb. Maier*");
- **Likely name match** (e.g., Search Person name "*Elisabeth Müller*" and Bank Person name "*Elisabeth Müller-Maier*", "*Elisabeth-Sofie Müller*", or "*E. Müller*");
- **Reverse first/last name(s)** (e.g., Search Person name "*Elisabeth Müller*" and Bank Person name "*Müller Elisabeth*"); and
- **Abbreviation of Last Name** (e.g., Search Person name "*Elisabeth Müller*" and Bank Person name "*Elisabeth M.*").⁶⁷

(218) For the following types of Name-Combinations, which were categorized as false positive Name-Combinations, all Documents related to the same specific distinct Name-Combination were filtered out and not processed for further review:⁶⁸

- **Not identical last name(s)** (e.g., Search Person name "*Elisabeth Müller*" and Bank Person name "*Elisabeth Maier*"); and
- **Not identical first name(s)** (e.g., Search Person name "*Elisabeth Müller*" and Bank Person name "*Sofie Müller*"); and
- **Legal entity** (e.g., Search Person name "*Elisabeth Müller*" and Bank Person name "*Elisabeth Müller AG*").

5.3 Automated Protection Mechanism

(219) To prevent the automated exclusion of relevant Documents, we established a special automated protection mechanism. The protection applied to Documents where one or both of the following scenarios were met:

- **Identical name match and close date of birth:** Documents with an Identical Name Match to the names of the Search Person, plus date of birth information within plus/minus five years from the date of birth of the respective Search Person as recorded on the Name Lists.
- **Argentina relation:** Documents containing a reference to Argentina based on the application of 427 Argentina-related search terms across metadata and Documents following the application of optical character recognition ("**OCR**") to convert the available images of typed text into machine-encoded text in the Documents.⁶⁹

⁶⁷ The review code for this category in the Review Platform was "Initials not matching first name(s)."

⁶⁸ The Documents were still considered for quality assurance reviews and as part of the Second-Level Review.

⁶⁹ This scenario did not apply for the SWC List because the individuals on the SWC List do not have an explicit connection to Argentina.

5.4 First-Level Review

- (220) For all Documents identified after the review of Name-Combinations, the **First-Level Review** was conducted on a document-content level focusing on (i) the identification of potential identity matches with the respective Search Persons, (ii) the structured metadata collection of relevant additional Account or Bank Person-related information contained in the Document, and (iii) the identification of false positive Documents.
- (221) Working in Review Batches that included all Documents for a Search Person, we assessed the content of the Document to review and extract relevant attributes ("**First-Level Review Attributes**"). The First-Level Review Attributes included name match type, determination whether a Document was client-identifying, date of birth match, identification of Credit Suisse predecessor entity involved, Account opening and closing date, and Bank Person domicile and nationality. The assessment was documented by the reviewer in the Review Platform and relevant content was highlighted. The reviewer also captured additional relevant review information such as CIF or Account numbers in the Review Platform.
- (222) For the Argentine Lists, Documents were excluded from further review if the First-Level Review Attributes met the below Exclusion Criteria relating to the Argentine Lists:^{70,71}
- **Document identified as non-client identifying** (i.e., the Document relates to an individual which cannot be identified as a Bank client based on our manual Document review)
 - **Not identical first and/or last name(s)** (i.e., the Document indicates that the first and/or last name(s) of the Bank client and the respective Search Person is different)
 - **Different gender** (i.e., the Document indicates that the gender of the Bank client and the respective Search Person is different)
 - **Not identical date of birth** (i.e., the Document indicates that the date of birth of the Bank client and the Search Person is different)
 - **Accounts held by legal entities** (i.e., the Document indicates that the Account is held by a legal entity)
 - **Out of scope legal entities** (i.e., the Document indicates that the Account was maintained by a Credit Suisse predecessor entity other than SKA)
 - **Out of scope time frame** (i.e., the Document indicates that the Account was closed before 1933 or opened after 1960)⁷²

⁷⁰ The Documents were still considered for quality assurance reviews and as part of the Second-Level Review.

⁷¹ See *Chapter 7.5.3* for the specific Exclusion Criteria considered with respect to the SWC List.

⁷² The time period from when the Nazi party took power in Germany until the year when the Swiss Clearing Office released the last German blocked assets.

- **Out of scope domicile and/or nationality** (i.e., the Document indicates that the Bank client's domicile and/or nationality is identified as a country other than Argentina or a country belonging to the "Nazi Germany" as of 1941).⁷³

5.5 Second-Level Review

- (223) In the **Second-Level Review** we evaluated all Documents identified in the First-Level Review to assemble a Bank Person File with all available Documents pertaining to the same Bank Person and decided whether sufficient plausible facts exist to conclude that the Bank Person and the Search Person are the same individual. See *Chapter 5.7* for details on the categorization.
- (224) As part of this review, the reviewer captured additional information on domicile, nationality, Bank branch, indicia for Bank client assets, Account opening and closing date based on factual evidence in the Documents ("**Second-Level Review Attributes**").
- (225) For Search Persons with common last names, we frequently identified numerous Bank Persons with Name Similarity to these individuals. For those individuals with the most common last names, we had cases in which we identified more than 50 Bank Persons with Name Similarity to the Search Person.
- (226) On a case-by-case basis, our review also included the usage of the front-end application of CIF Host, and additional information from external public sources to validate a Bank Person File.
- (227) The Second-Level Review was conducted by a dedicated team of senior reviewers. The reviewers conducted a comprehensive assessment of available review observations and concluded whether sufficient plausible facts for a Banking Relationship related to a Search Person were identified or whether a Bank Person File was considered *For Further Investigation*.

5.6 Identity Investigation

- (228) In the context of the Argentine Lists, for Search Persons for which sufficient plausible facts for a Banking Relationship had been identified, and for Bank Person Files flagged *For Further Investigation*, dedicated senior reviewers performed an **Identity Investigation**.
- (229) In the context of the SWC List, the Identity Investigation was conducted for Search Persons for which sufficient plausible facts for a Banking Relationship had been identified, and for the Bank Persons related to Search Persons that were categorized as "Matches with unspecific facts", "Matches with insufficient facts", or "Matches with disconfirming facts" after the Second-Level Review.

⁷³ The countries that were part of "Nazi Germany" as of 1941 were Germany, Poland, Austria, Czech Republic, and Hungary.

- (230) During the Identity Investigation, the reviewer created additional Archive Research Requests with broader name coverage and conducted further public research on both the Search Person and the respective Bank Person to establish a more comprehensive fact base for a categorization of our review observation. See *Chapter 5.7* for details on the categorization.
- (231) During the Identity Investigation, the senior reviewers regularly performed research or targeted searches in the following sources on a case-by-case basis:
- Additional Archive Research Requests, in particular for data sources related to legal matters and the Swiss Clearing Office;⁷⁴
 - The CCA and PRA;⁷⁵
 - Documentation created by Prof. Jung, comprising both Prof. Jung's results and his working papers (for the SWC List);
 - Documentation created by Arthur Andersen, comprising both manual reviews in the Arthur Andersen Archive, as well as manual searches for names in the Arthur Andersen Database; and
 - Collection of additional public source information based on internet search engines, publicly available name databases, party membership records, ship manifests, and Argentinian and American government archives, among others.⁷⁶
- (232) Based on the additional information collected during the Identity Investigation, the categorization assigned based on the preceding Second-Level Review was confirmed or updated. If we identified plausible facts for a Banking Relationship, we documented additional identified information on the nature, content, size, and other features of these Accounts.

5.7 Categorization of review observations

- (233) Where sufficient plausible facts for a Banking Relationship had been identified, we categorized the respective Search Person as "Matches with reasonable evidence" or "Matches with specific supporting facts", depending on the specificity of identifying information found in our reviews (see *Table 6*).

⁷⁴ The Swiss Clearing Office was a governmental body founded in 1934 that administrated the clearing of payments to and from Switzerland. After the Second World War, the Swiss Clearing Office also managed blocks placed on foreign assets held in Switzerland that were documented in comprehensive lists of clients and asset information reported by Swiss banks.

⁷⁵ See *Chapter 3.4.1* and *Chapter 3.4.2*.

⁷⁶ Publicly available ship manifests typically include information on a passenger's year of birth, their domicile prior to departure / emigration and occupation, and frequently also allowed for identification of family members (e.g., name of spouse).

Observation	Category
Sufficient plausible facts for Banking Relationship identified	1A – Match with reasonable evidence
	1B – Match with specific supporting facts

Table 6: Overview of categories used to describe matches where sufficient plausible facts for a Banking Relationship had been identified

(234) The categorization was made on a case-by-case basis following comprehensive assessment of available information in the Bank Person Files.

The following represents typical patterns for Search Persons where plausible facts for a Banking Relationship have been identified. Other patterns may also have resulted in the identification of sufficient plausible facts for Banking Relationship.

(235) For "Matches with reasonable evidence" (Category 1A):

- **Identical Name Match and consistent date of birth:** The Search Person and the Bank Person have (i) an Identical Name Match, and (ii) the Bank Person's date of birth, as identified in bank documents, is identical to the date of birth recorded for the Search Person.
- **Identical Name Match and consistent title and geographic reference:** The Search Person and the Bank Person have (i) an Identical Name Match, and (ii) the title and/or occupational information of the Bank Person and the Search Person is consistent; and (iii) bank documentation (e.g., a registry card), refers to the Bank Person's city of domicile. The city is consistent with the domicile information identified for the Search Person, either based on the Argentine Lists or based on additional public records such as ship manifests.
- **Identical Name Match and consistent geographic reference and nationality:** The Search Person and the Bank Person have (i) an Identical Name Match, and (ii) bank documentation (e.g., a registry card) refers to the Bank Person's city of domicile as well as the Bank Person's nationality, and (iii) domicile and nationality information identified for the Bank Person is consistent with the information identified for the Search Person, either based on the Argentine Lists or based on additional public records such as ship manifests.
- **Name Similarity and consistent geographic reference and name of spouse:** The Search Person and the Bank Person have (i) Name Similarity, and (ii) based on additional public records such as ship manifests, the name of the Search Person's spouse has been identified, and (iii) bank documentation (e.g., a registry card of a joint Account) refers to both the name of the Search Person as well as the name of their spouse.

(236) For "Matches with specific supporting facts" (Category 1B) – the patterns are weaker than for 1A, but still sufficient to conclude that the Bank Person and the Search Person are the same individual - and that the Search Person had a Banking Relationship with SKA or another Credit Suisse predecessor bank in Switzerland:

- **Name Similarity and consistent geographic reference:** The Search Person and the Bank Person have (i) Name Similarity, and (ii) bank documentation (e.g., a registry card) refers to the Bank Person's city of domicile, and (iii) the city is consistent with the domicile information identified for the Search Person, either based on the Argentine Lists or based on additional public records such as ship manifests, and (iv) no additional reasonable evidence to confirm the person identity has been identified.
- **Name Similarity based on rare last name and consistent geographic reference:** The Search Person and the Bank Person have (i) Name Similarity based on rare last name, and (ii) bank documentation (e.g., a registry card) refers to the Bank Person's city of domicile, and (iii) the city is consistent with the domicile information identified for the Search Person, either based on the Argentine Lists or based on additional public records such as ship manifests, and (iv) no additional reasonable evidence to confirm the person identity has been identified.

(237) We also categorized Search Persons for which we did not identify sufficient plausible facts for a Banking Relationship.

5.8 Documentation of results

(238) As described in *Chapter 4.4*, all identified Documents relevant to this Investigation were processed in the Investigation Workspace and uploaded and managed by AlixPartners in the Review Platform. The comprehensive review is documented in the Review Platform.

(239) For ease of access, we leveraged the Documents and information from public sources that we reviewed and annotated in the Review Platform to generate Case Binders that contain summaries of our observations in PDF format. The Case Binders, which were created for each Search Person, contain all information identified and deemed relevant for both the Search Person and the associated Bank Person(s), including our findings regarding the potential existence of an Account for the specific Search Person.

(240) For those Search Persons where sufficient plausible facts for a Banking Relationship were identified, "**Fact Summaries**" have been prepared. The Fact Summaries summarize the supporting facts and our findings for the identified Banking Relationships.

(241) The Fact Summaries were provided to Credit Suisse and are available as Annex 1 at Credit Suisse in Switzerland.

5.9 Progress presentations to stakeholders

(242) Based on the Case Binders summarizing the results of our Investigation, we provided interim updates on our findings to the Bank and Homburger at regular intervals.

- (243) Typically, the update meetings comprised presentations on selected Search Persons, focusing in particular on those Search Persons where plausible facts for a Banking Relationship had been identified. Further, we presented interim observations on Search Persons where no definitive categorization was made in accordance with our methodology, e.g., due to scarcity of information identified in Bank documentation.
- (244) In addition to sharing our interim observations with the Investigation's stakeholders, the update meetings were also used to collect factual input from these parties, where applicable. Following our review and consideration of the input received, factual input deemed relevant by AlixPartners is reflected in the findings documented in this Report.

ARGENTINE LISTS

6 Argentine Lists

6.1 Background and content of the Argentine Lists

(245) The **UAG List**, as accessible on the website of the Chamber of Deputies of Argentina, comprises 403 color-scanned pages of 10,909 names of members of the "Unión Alemana de Gremios", i.e., the German Union of Syndicates.⁷⁷ In addition to the member names, the UAG List also contains information on the listed members' date of birth, membership number, and their allocation to geographic districts within Argentina.

NOMBRE	Fecha de nacimiento	Distrito: Florida		NOMBRE	Fecha de nacimiento	Distrito: Florida	
		Ingreso	Número			Ingreso	Número
Althoff, Franz	31- 3-92	1- 8-37	5.492	Hora, Hans	3- 5-94	1- 4-38	3.961
Apfelböck, Johann	3- 5-98	1- 2-37	3.897	Hueber, Josef	2- 5-00	1-12-40	8.831
Auschrat, Bruno	24- 3-91	1- 7-40	7.903	Hüttner, August	22- 8-01	1- 1-41	8.833
Bähr, Erich	7- 5-01	1-12-35	3.898	Huth, Hans Georg	31- 1-00	1- 4-39	3.962
Baumgarten, Kurt	21- 2-01	1- 1-38	3.899	Ulmer, Karl	28-10-08	1-10-38	880

Figure 19: Extract from the UAG List

(246) Following the digitization of the UAG List and based on identical membership numbers, names, and birth dates, we identified 1,958 duplicate entries on the UAG List (see Chapter 6.2). Table 7 below shows selected samples of duplicate entries identified by us.

	Individual 1	Individual 2	Individual 3
Example 1	Scheelen, Hermann 3-10-88 1-10-40 8.302	Scheelen, Hermann 3-10-88 1-10-40 8.302	Scheelen, Hermann 3-10-88 1-10-40 8.302
Name	Hermann Scheelen	Hermann Scheelen	Hermann Scheelen
DOB	3 October 1888	3 October 1888	3 October 1888
UAG entry date	10 January 1940	10 January 1940	10 January 1940
UAG membership number	8.302	8.302	8.302
UAG List page number	195	199	248

⁷⁷ Comisión Investigadora de Actividades Antiargentinas, Informe No 5, Camera de Diputados de la Nación, 1941.

	Individual 1	Individual 2	Individual 3
Example 2	Lange, Emilio 24- 3-98 1- 9-40 8.187	Lange, Emilio 24- 3-98 1- 9-40 8.187	Lange, Emilio 24- 3-98 1- 9-40 8.187
Name	Emilio Lange	Emilio Lange	Emilio Lange
DOB	24 March 1898	24 March 1898	24 March 1898
UAG entry date	9 January 1940	9 January 1940	9 January 1940
UAG membership number	8.187	8.187	8.187
UAG List page number	194	200	249

Table 7: Selected duplicates identified on UAG List

- (247) As a result, we identified 8,951 unique entries on the UAG List that were used as the basis for the Investigation.
- (248) The **Argentine NSDAP List**, too, is accessible online based on United States governmental records.^{78,79} The list includes 1,374 names of members of the Argentine branch of the German Nationalist Socialist Party, including their date and place of birth, entry date, address, and occupation.

Nazi Party membership records—Continued
ARGENTINA

Number	Name	Date entered	Birthdate	Birthplace	Address	Occupation
1296876	Appel, Adam	Apr. 1, 1932	June 8, 1893	Gonsenheim	Buenos Aires, Belgrano Congress 3325	Cabinetmaker.
2196689	Appelhaus, Elena Marie	Oct. 1, 1934	Feb. 8, 1890	Buenos Aires	Buenos Aires, Conesa 1330	Housewife.
3400346	Appelhaus, Kurt	Mar. 1, 1934	Jan. 16, 1882	Osterode	do	Clerk.
7017367	Aebatz, Emmerich	Feb. 1, 1939	Oct. 26, 1916	Ober-Radkersburg	Ayacucho, F. C., Sud	Do.
2183382	Ackermann, Franz	Oct. 1, 1934	July 12, 1902	Hannover	Buenos Aires, Los Patos, 1938	Do.
3281215	Albert, Johannes	July 1, 1933	Mar. 6, 1906	Nürnberg	Buenos Aires, Bambas 7 Depa	Do.
3799612	Alendorf, Rudolf	May 1, 1935	June 16, 1894	Nauen	do	Do.

Figure 20: Extract from Argentine NSDAP List

- (249) We identified one duplicate, reducing the number of unique names on the Argentine NSDAP List to 1,373.

⁷⁸ United States Senate Committee on Military Affairs, Argentina Nazi Party Membership Records, March 1946, Stanford University Libraries.

⁷⁹ United States Senate Committee on Military Affairs, Argentina Nazi Party Membership Records, March 1946, Columbia University.

6.2 Digitization of the Argentine Lists

- (250) To digitize the scan of the UAG List and Argentine NSDAP List, together referred to as the **Argentine Lists**, and extract all member data in a structured format, we first applied OCR to convert the available images of typed text into machine-encoded text. In a second step, manual post-processing activities were conducted, such as cleansing of typographical errors and creation of a unique ID for each digitized table row (i.e., for each name from the UAG List).⁸⁰
- (251) In preparation of the Name Matching as described in *Chapter 4.1*, we harmonized the spelling of maiden names and adjusted punctuation in names, name structure, and name affixes. In addition, we separated combined maiden and married names into separate name variants, and alternative spellings were added for obviously misspelled names. List entries based on German first names have been enhanced with name variants based on the Spanish name equivalents and vice versa. Each modification constituted a **Name Variant** that was used in the Name Matching process, in addition to the original name as found on the Argentine Lists.
- (252) *Table 8* below provides selected examples of Name Variants created for UAG Persons.

Original name as identified on UAG List	Name Variant type	Name Variants used for Name Matching
Steininger, Franziska geb. Königsbauer	Original name as on UAG List	Steininger geb. Königsbauer, Franziska
	Separation of combined maiden and married names	Königsbauer, Franziska Steininger, Franziska
	Spanish name equivalents	Steininger geb. Königsbauer, Francisca Königsbauer, Francisca Steininger, Francisca
Mohs, Johannes	Original name as on UAG List	Mohs, Johannes
	Alternative for misspelled name	Mohs, Johannes
	Spanish name equivalents	Mohs, Juan
Krüger, Wilhelm	Original name as on UAG List	Krüger, Wilhelm
	Harmonization of punctuation	Krueger, Wilhelm
	Spanish name equivalents	Krüger, Guillermo Krueger, Guillermo

Table 8: Examples of Name Variants created for UAG List members

⁸⁰ Technical details on the digitization of the Argentine Lists are documented in working documents stored at Credit Suisse in Switzerland.

(253) Following the digitization of both the UAG List and the Argentine NSDAP List, we identified an overlap of 755 individuals included on both lists.⁸¹ *Table 9* below provides examples of individuals identified on the UAG List and the respective duplicates identified on the Argentine NSDAP List:

	UAG Person	Argentine NSDAP Person
Example 1	Frank-Langer, Eugen 7- 7-03 Distrito: Tucumán 1- 3-39	Langer, Eugen. July 7, 1903 Buenos Aires, 3 de Febrero 2257. May 1, 1939
Name	Eugen Frank-Langer	Eugen Langer
DOB	7 July 1903	7 July 1903
Geographic reference	Tucuman	Buenos Aires, 3 de Febrero 2257
Entry date	1 March 1939 (UAG)	1 May 1939 (Arg. NSDAP)
Example 2	Volberg, Heinrich 22- 8-05 Distrito: Belgrano 1- 8-34	Volberg, Heinrich Aug. 22, 1905 Belgrano Jan. 5, 1934
Name	Heinrich Volberg	Heinrich Volberg
DOB	22 August 1905	22 August 1905
Geographic reference	Belgrano	Belgrano
Entry date	1 August 1934 (UAG)	5 January 1933 (Arg. NSDAP)

Table 9: Selected examples of duplicates identified between UAG List and Argentine NSDAP List

(254) Subsequently, the Argentine Lists used for the Investigation comprised 9,569 unique names and 24,962 Name Variants (see *Table 10*)⁸²

	UAG List	Argentine NSDAP List	Argentine Lists
Number of names on lists	10,909	1,374	12,283
Number of unique names	8,951	1,373	9,569
Number of Name Variants based on unique names	23,773	4,307	24,962

Table 10: Number of names on UAG List and Argentine NSDAP List

⁸¹ Technical details on how duplicates between the UAG List and Argentine NSDAP List had been identified are documented in working documents stored at Credit Suisse in Switzerland.

⁸² In total, 24,986 Name Variants were provided to Credit Suisse for Name Matching. 24 Name Variants were identified as duplicates during the review.

6.3 Name Matching process for Argentine Lists

(255) As a result of the Name Matching process for the Argentine Lists, as described in *Chapter 4.1.3*, the Bank produced structured data for ~25.7 million Hits across the various Data Pools in scope for the Investigation. After technical de-duplication and processing, the ~25.7 million Hits related to ~10.2 million Documents as the basis for subsequent review and investigation, as shown in *Table 11* below. These Documents related to 9,022 of the 9,569 unique names on the Argentine Lists. For the other 547 Argentine Lists Persons, no Hit in SAMatching was identified.

	Argentine Lists
Number of Hits	~25.7m
Number of Documents	~10.2m
Number of associated Argentine Lists Persons	9,022

Table 11: Overview of Hits and Documents for the Argentine Lists

6.4 Review Approach for Argentine Lists

6.4.1 Application of Exclusion Criteria and Protection Mechanism

- (256) Given the fact that we asked the Bank to conduct the Name Matching and produce Documents across all selected Data Pools and without time restrictions, we had to implement processes to identify the Documents in the Review Platform that are potentially relevant to our Investigation and filter out obvious false positive Documents.
- (257) Bank client and Account-specific criteria were applied to available metadata to identify false positive Documents. As described in *Chapter 5.1*, the Automated Application of Exclusion Criteria was conducted to identify irrelevant Documents based on metadata (see *Chapter 5.1* for detailed description of Exclusion Criteria).
- (258) To ensure that potentially relevant Documents were not excluded, we implemented a Protection Mechanism that applied to all Documents related to Argentine Lists Persons. The Documents identified by the Protection Mechanism, which is described in *Chapter 5.3*, were automatically identified and marked for First-Level Review based on the criteria defined, i.e., an Identical Name Match and similar date of birth or a hit on an Argentina search term, independent of any Exclusion Criteria applied.
- (259) Under consideration of the Automated Protection Mechanism, the application of the described Exclusion Criteria allowed us to filter out ~95.5% of the previously identified Documents, i.e., 9.7 million Documents, as shown in *Table 12* below. Of the Exclusion Criteria applied, inconsistencies in date of birth information, as well as Accounts outside the NS Period, accounted for most exclusions, i.e., ~6.2 million and ~2.9 million Documents, respectively. For 703 Argentine Lists Persons, all related Documents were subject to Exclusion Criteria. As part of our quality assurance, we had performed dedicated tests to confirm the adequacy of the Exclusion Criteria, as described in *Chapter 9.3*.

(260) As a result, ~462k Documents related to 8,319 Argentine Lists Persons were identified for further review following the Automated Application of Exclusion Criteria.

Automated Application of Exclusion Criteria	Argentine Lists	
	Number of Documents	Number of Argentine Lists Persons
In scope for application of Exclusion Criteria	~10.2m	9,022
Filtered out based on application of Exclusion Criteria	~9.7m	703
Identified as potentially relevant after application of Exclusion Criteria	~462k	8,319

Table 12: Number of Documents after Automated Application of Exclusion Criteria for Argentine Lists

6.4.2 Manual Review of Name-Combinations

(261) We subsequently performed a Manual Review of Name-Combinations, described in detail in *Chapter 5.2*, to identify relevant names for further review and to exclude irrelevant Name-Combinations that were different from the name of the Argentine Lists Person.

(262) Documents related to Name-Combinations considered an "identical" or "likely" name match, as well as Documents where first and last names have been reversed or where Bank client's name has been abbreviated but the initial matches the name of the respective Argentine Lists Person (all together defined as **Name Similarity**), were considered potentially relevant for the Investigation. As a result, and as shown in *Table 13*, ~205k Documents related to ~44k Name-Combinations were identified as potentially relevant for further review and investigation.

Manual Review of Name-Combinations	Argentine Lists	
	Number of Documents	Number of Argentine Lists Persons
In scope of review	~462k	8,319
Documents with Name Similarity based on review	~205k	5,751
Filtered out based on review	~257k	2,568

Table 13: Manual Review of Name-Combinations for Argentine Lists

(263) *Table 14* below provides selected examples of Name-Combinations considered relevant for the Investigation based on Name Similarity:

Name-Combination type	Examples	
	Search Person name	Bank Person name
Identical name match	Hans Mueller	Hans Mueller
	Hans Mueller	Hans Müller
Likely name match	Hans Mueller	Hans Christian Müller
	Felipe Mueller	F. Müller
	Philipp Mueller	Philipp Müller, Direktor
Reversed first / last names	Paul Walter	Walter Paul
Initial not matching first name(s)	Paul Walter	Paul W.

Table 14: Selected relevant Name-Combinations based on Name Similarity

- (264) By contrast, all Documents related to an irrelevant Name-Combination were excluded from further review (see Chapter 5.2).
- (265) Under consideration of the Automated Protection Mechanism, the Manual Review of Name-Combinations filtered out ~257k Documents as the Name-Combination(s) identified in the Document was considered a false positive. Of the 8,319 Argentine Lists Persons with one or more Documents in scope for the Manual Review of Name-Combinations, for 2,568 Argentine Lists Persons, all Documents were linked to Name-Combinations categorized as false positive.

6.4.3 First-Level Review

- (266) For ~205k Documents identified for further review during the Manual Review of Name-Combinations, a First-Level Review was conducted on a document content level.
- (267) As described in Chapter 5.4, the First-Level Review focused on (i) the identification of potential identity matches with the respective Argentine Lists Persons, (ii) the structured metadata collection in the Review Platform of relevant additional Account or Bank Person-related information contained in the Document, e.g., the date of birth or the domicile, and (iii) the identification of false positive Documents.
- (268) Working in Review Batches that included all Documents for a specific Argentine Lists Person, the reviewers assessed the individual attributes of each Document to identify relevant facts, if applicable.
- (269) As a result, and as shown in Table 15, ~13k Documents related to 1,841 Argentine Lists Persons were identified as potentially relevant for further review.

First-Level Review	Argentine Lists	
	Number of Documents	Number of Argentine Lists Persons
In scope	~205k	5,751
Potentially relevant based on First-Level Review	~13k	1,850
Filtered out based on First-Level Review	~189k	3,555
Not reviewed since Document was irretrievable ⁸³	~3k	346

Table 15: First-Level Document Review for Argentine Lists

- (270) By contrast, ~189k Documents, where the reviewer identified clear Exclusion Criteria, were filtered out and not processed for further review (see *Chapter 5.4* for detailed descriptions).
- (271) Of the 5,751 Argentine Lists Persons in scope for the First-Level Review, for 3,555 Argentine Lists Persons, all related Documents in the First-Level Review were subject to Exclusion Criteria and filtered out.
- (272) Approximately 3k Documents could not be identified and retrieved. Because the Documents could not be identified, we were not able to review them and decide whether the Hit was relevant. The results of a comprehensive analyses of these Documents conducted in close alignment with the Bank is described in *Chapter 4.3.4*.

6.4.4 Second-Level Review

- (273) For the ~13k Documents identified for further review and investigation during the preceding First-Level Review, a Second-Level Review was conducted.
- (274) As part of this review, all Documents pertaining to the same unique Bank client were consolidated into a Bank Person File that constituted the basis for the Second-Level Review. On a case-by-case basis, our review also included research in CIF Host and the collection of additional information in external public or non-public data sources to validate a Bank Person File. The Review Approach for the Second-Level Review is described in detail in *Chapter 5.5*.
- (275) Our dedicated senior reviewers evaluated the facts in the identified documents and decided whether sufficient plausible facts exist to conclude that the Bank Person and the Argentine Lists Person are the same individual.
- (276) If sufficient plausible facts for a Banking Relationship were identified or when a Bank Person File was flagged *For Further Investigation*, additional research was initiated, referred to as Identity Investigation (see *Chapter 6.4.5*).

⁸³ See *Chapter 4.3.4* for details.

(277) In total, the Second-Level Review of ~13k Documents associated with 1,850 Argentine Lists Persons resulted in the creation of ~6k Bank Person Files. On average, for each Argentine Lists Person, we identified more than three Bank Persons with Name Similarity.

6.4.5 Identity Investigation

(278) The Identity Investigation was performed by dedicated senior reviewers, observing the four-eyes principle (see *Chapter 9.1.1*).

(279) The Identity Investigation consisted of a comprehensive research and investigation of the available public information and additional Archive Research Requests to provide a comprehensive factual basis for a consistent, fact-based categorization (see *Chapter 5.6*).

(280) The most relevant public sources that we regularly considered to search for the names on the Argentine Lists in the Identity Investigation included (i) the ~40,000 documents of the Special Commission,⁸⁴ (ii) historical ship manifests for vessels departing from Germany towards South America,⁸⁵ (iii) records for NS regime members in the electronic Swiss and German federal archives or provided on the web site of Yad Vashem, (iv) reports of the Claims Resolutions Tribunal of the Holocaust Asset Litigation,⁸⁶ (v) the websites of the Office of the Historian and the National Archives and Records Administration in the United States,^{87,88} (vi) dedicated genealogical databases such as ancestry.com or familysearch.com, and (vii) relevant additional information identified by our research on the internet.

(281) In total, we performed an Identity Investigation for 363 Bank Person Files related to 308 Argentine Lists Persons.

(282) Based on the additional information collected during the Identity Investigation, the reviewers decided whether sufficient plausible facts for a Banking Relationship have been identified and documented these results in the Review Platform. For all responsive Accounts, the reviewer documented additional identified information on the nature, content, size, and other features of the Accounts.

6.5 Results

(283) Our Investigation and extensive Document review of Argentine Lists Persons identified eight individuals on the Argentine Lists who held an Account at SKA at some point between 1933 and 1945.

⁸⁴ Comisiones Especiales, Comisión especial investigadora de actividades antiargentinas (1941 – 1943), <https://apym.hcdn.gob.ar/comisiones-especiales/nazis/inventario/>, (last accessed on March 3, 2023).

⁸⁵ Gesellschaft für Familienforschung e.V. Bremen - Staatsarchiv Bremen, Bremen Passenger Lists, <http://www.passengerlists.de/>, (last accessed on March 3, 2023).

⁸⁶ Claims Resolution Tribunal, Holocaust Victim Asset Litigation, www.crt-ii.org/, (last accessed on February 28, 2023).

⁸⁷ Department of State United States of America, Office of the Historian, <https://history.state.gov/>, (last accessed on February 28, 2023).

⁸⁸ The U.S. National Archives and Records Administration, <https://www.archives.gov/>, (last accessed on February 28, 2023).

Search Person Type	Account Opening			
	<1933 ⁸⁹	1933-1938	1939-1945	Total (1933-1945)
Argentine NSDAP Members	1	1	0	2
Argentine NSDAP & UAG Members	0	2	0	2
UAG Members	3	1	0	4
Total	4	4	0	8

Table 16: Overview of Account openings dates of Argentine Lists Persons with plausible facts for a Banking Relationship in the NS Period.

(284) For the period after 1945, plausible facts for a Banking Relationship were identified for 70 additional Argentine Lists Persons (see Chapter 8.1).

6.5.1 Accounts held by Argentine Lists Persons between 1933 and 1945

(285) Of the eight Accounts, one of these Accounts was open during the Second World War, and the account holder was identified on the UAG List but not on the Argentine NSDAP List (Individual A.4 in Table 17). In four of the eight cases, the individual joined the UAG or Argentine NSDAP after the Account was closed (Individuals A.2, A.3, A.5, and A.7 in Table 17). Seven of the Accounts were closed by January 1937.

(286) An overview of these Accounts is shown in Table 17.

Ind.	List and Entry Date	Account Opening Date	Account Closing Date	Available Asset Information and Source ⁹⁰
A.1	UAG (1936)	1929	1936 ⁹¹	Less than CHF 50,000 in 1932; Depot Card
A.2	NSDAP (1936)	1931	1934	Less than CHF 250,000 in 1934; Depot Card
A.3	UAG (1935)	1931	1935	Not identified
A.4	UAG (1938)	1931	1974	CHF 308,000 in 1934; Depot Card
A.5	UAG (1940)	1933	1934	Not identified
A.6	NSDAP (1932)	1933	1936	Less than CHF 20,000 in 1933; Depot Card
A.7	UAG (1935) NSDAP (1935)	Not identified	1934	Not identified
A.8	UAG (1940) NSDAP (1934)	1935	1937	Less than CHF 100 in 1936; ledger information

Table 17: Overview of Argentine Lists Persons with plausible facts for a Banking Relationship in the NS Period

⁸⁹ The banking relationships shown in this column were active in 1933 and beyond.

⁹⁰ Information may be unrepresentative of the full extent of assets held by the individual, as it only provides a snapshot at a specific point in time. Information shows the highest identified amount.

⁹¹ The Account was closed two months after the individual joined the UAG in 1936.

- (287) Seven of the Accounts were closed by January 1937 and, in four of these cases, the individual joined the UAG or Argentine NSDAP after the Account was closed (Individuals A.2, A.3, A.5, and A.7 in *Table 17*).
- (288) One of the eight Accounts was open during the Second World War, and the account holder was identified on the UAG List but not on the Argentine NSDAP List (Individual A.4 in *Table 17*). Multiple records in the period from 1931 to 1945 on the assets in this Account have survived. Based on the available information, the highest identified balance was CHF 308,000 in March 1934.⁹² For this Account we did not identify significant (i.e., more than CHF 10,000) asset increases or asset inflows during the Second World War (from September 1939 to 1945).
- (289) Based on the work we performed, we identified no new Account that was opened for an Argentine Lists Person between February 1935 and 1945. For five of the eight individuals, selected asset information was identified (see *Table 17*).
- (290) Based on our review of the available underlying identified documents relating to these eight Accounts, we have identified no evidence that would indicate (i) that any of the eight Accounts were ever dormant, or (ii) that the one account that was open between January 1937 and 1945 (Individual A.4 in *Table 17*) had significant (i.e., more than CHF 10,000) asset increases or asset inflows during the Second World War (September 1939 – 1945).⁹³
- (291) The categorization of the individuals listed in *Table 17* was based on the following case-specific rationales:
- Individual A.1: Based on scans of handwritten registry cards and typed depot cards, we identified an Identical Name Match. The Argentine Lists Person, a member of the UAG as of 1936, was identified on the manifest of a vessel to South America in the 1930s. The individual was not on the Argentine NSDAP List. The name of the joint account holder, as per the Bank's records, is consistent with the name of the Argentine Lists Person's spouse according to the ship manifest. The Bank Person's Argentinian domicile is consistent with the Argentine Lists Person's living circumstances. Between 1929 and 1936, the Bank Person held current and foreign currency Accounts, as well as a fiduciary deposit. Based on the limited available information, the Bank Person's assets were identified as being less than CHF 50,000 in 1932.
 - Individual A.2: Based on scans of handwritten registry cards and typed depot cards, we identified an Identical Name Match based on a rare last name. The Argentine Lists Person, a member of the Argentine NSDAP as of 1936, was identified on the manifest of a vessel to South America in the 1920s. The Bank Person's Argentinian domicile is consistent with the Argentine Lists Person's living circumstances.

⁹² Note that information on assets in his current Account has not been retained.

⁹³ In the 1930s and 1940s, transactions were not documented to the same degree as they are today and information on the originators and beneficiaries of transactions is generally not available in the still available documents from that period.

Between 1931 and 1934, the Bank Person held a current account and foreign currency Accounts, and a fiduciary deposit, among others. Based on the identified depot cards, the Bank Person's assets were identified as being less than CHF 250,000 in 1934.

- Individual A.3: Based on poor-quality scans of handwritten registry cards and typed lists of client names, we identified an Identical Name Match based on a rare last name. The Argentine Lists Person, a member of the UAG as of 1935, was identified on the manifests of vessels to South America in the 1920s and 1930s. The individual was not on the Argentine NSDAP List. The Bank Person's Argentinian domicile is consistent with the Argentine Lists Person's living circumstances. Between 1931 and 1935, the Bank Person held a current Account and a fiduciary deposit. No asset information was identified.
- Individual A.4: Based on scans of handwritten and typed registry cards, as well as comprehensive depot cards, we identified an Identical Name Match based on a rare last name. The Argentine Lists Person, a member of the UAG as of 1938, was identified on the manifests of vessels to South America in the 1920s and 1930s. The individual was not on the Argentine NSDAP List. The Bank Person's Argentinian domicile is consistent with the Argentine Lists Person's living circumstances. Brazilian immigration documentation identifies the Argentine Lists Person as an Argentinian national in the 1950s – prior immigration cards identify the Argentine Lists Person as a German national, which is consistent with the Bank Person's nationality identified in the Bank's records. Between 1931 and 1974, the Bank Person held current Accounts and fiduciary deposits, among others. Based on the identified depot cards, the Bank Person's assets were identified as being CHF 308,000 in March 1934. We identified additional Accounts related to the Bank Person's spouse and son. The names of the spouse and the son referenced in such additional Accounts are consistent with the names of the Argentine Lists Person's spouse and son.
- Individual A.5: Based on a scan of a handwritten registry card, we identified a Name Similarity based on a rare last name. The Argentine Lists Person, a member of the UAG as of 1940, was identified on the manifests of vessels to South America in the 1920s. The individual was not on the Argentine NSDAP List. The Bank Person's Argentinian domicile is consistent with the Argentine Lists Person's living circumstances. Between 1933 and 1934, the Bank Person held a current Account. No asset information was identified.
- Individual A.6: Based on scans of handwritten and typed registry and depot cards, among others, we identified an Identical Name Match. The Bank Person's title and domicile information is consistent with the living circumstances of the Argentine Lists Person according to the Argentine NSDAP List. The Argentine Lists Person, a member of the Argentina NSDAP as of 1932, was identified on the manifest of a vessel to South America in the 1920s. Between 1933 and 1936, the Bank Person held a current Account and fiduciary deposits. Based on the identified depot cards, the Bank Person's assets were identified as being less than CHF 20,000 in 1933.

- Individual A.7: Based on a scan of a handwritten registry card, we identified an Identical Name Match based on a rare last name. The name of joint Account holder is consistent with the name of the Argentine Lists Person's spouse. The Bank Person's South American domicile is consistent with the Argentine Lists Person's living circumstances. No asset information was identified. It is unclear when the individual opened an account, but it was closed in 1934. In 1935, a year after the account closed, the individual became a member of the UAG and the Argentine NSDAP. Although the individual no longer had a relationship with SKA after 1934, because the individual played a role in Nazi history during and after the war, we identified the person as an Individual of Interest (see *Chapter 9.4*).
- Individual A.8: Based on scans of handwritten registry cards and typed lists of client names and associated Account balance information, we identified an Identical Name Match based on a rare last name. The Argentine Lists Person was a member of the Argentine NSDAP as of 1934 and the UAG as of 1940. The Bank Person's domicile was a German city consistent with information identified for the Argentine Lists Person on the Argentine NSDAP List. Between February 1935 and January 1937, the Bank Person held a current Account and a fiduciary deposit. Based on Bank documents, the Account balance was identified as being less than CHF 100 in 1936.

6.5.2 Argentine Lists Persons without sufficient plausible facts for a Banking Relationship

(292) For 9,491 Argentine Lists Persons, we did not identify sufficient plausible facts for a Banking Relationship.

This comprises 1,629 Argentine Lists Persons for whom we identified unspecific, insufficient or disconfirming facts, as well as 7,862 Argentine Lists Persons for whom we identified reasonable evidence for person non-identity or no matches.

(293) *Table 18* below provides an overview of the Argentine Lists Persons without sufficient plausible facts for a Banking Relationship:

Observation	Category	Total	
Not sufficient plausible facts for Banking Relationship identified	2A – Match with unspecific facts	72	1,629
	2B – Match with insufficient facts	1,358	
	2C – Match with disconfirming facts	199	
	3A – Match with reasonable evidence for person non-identity	143	7,862
	3B – Automated / manual exclusions	7,172	
	3C – No name match on any Bank document	547	
Total			9,491

Table 18: Overview of Argentine Lists Persons without sufficient plausible facts for Banking Relationship

SWC LIST

7 SWC List

- (294) AlixPartners assessed independently the accuracy and completeness of Prof. Jung's historical research of the SWC List and reviewed newly identified Account information related to the period 1933 to 1950 at Credit Suisse's predecessor banks in Switzerland.
- (295) While building on the methodology and processes defined and developed for the Investigation, the SWC List Assessment differed from the Investigation of the Argentine Lists in that it only included prominent NS regime members, industrialists, and bankers. As such, (i) the application of Exclusion Criteria was limited to inconsistencies in date of birth, Accounts opened after the respective individual's date of death, and Data Pools covering current Account information, (ii) the SWC List Assessment was conducted against the background of the "Person Identities" identified by Prof. Jung, and, on a case-by-case basis, (iii) emphasized case-specific deep dives, including Specific Archive Requests.

7.1 Background and content of SWC List

- (296) The SWC List is available as a scan of a faxed document and comprises 13 pages of 334 *senior Nazi officials, leaders of the SS and the concentration camps, industrialists and bankers who may have transferred looted assets to neutral countries*, as compiled by the SWC. In addition to name information, the SWC List also contains information on the listed individuals' year of birth and background information on their position.

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LIST OF SENIOR NAZI OFFICIALS, LEADERS OF THE SS AND THE CONCENTRATION CAMPS, INDUSTRIALISTS AND BANKERS WHO MAY HAVE TRANSFERRED LOOTED ASSETS TO NEUTRAL COUNTRIES
COMPILED BY THE SIMON WIESENTHAL CENTER

#	Name (Last, First)	DOB	Position
1.	Abetz, Otto	1903	German Ambassador to Vichy France
2.	Abs, Herman Josef	1901	German Banker - Financed industrial complex at Auschwitz as Chairman of the Deutsche Bank.
3.	Amann, Max	1891	Hitler's personal business manager and newspaper proprietor.
4.	Ambros, Otto		Chief of Chemical Warfare Committee at I.G. Farben, production chief for poison gas.
5.	Angerer, Sepp		Early procurer of artwork for Goering
6.	Axmann, Artur	1913	Reich Youth Leader in Fuehrerbunker during Hitler's last days
7.	Bach-Zelewski, Erich	1899	General of the Higher SS & Police. Notorious murderer of Jews.
8.	Backe, Herbert	1896	Reich Minister for Food and Agriculture during last year of Reich.
9.	Baer, Richard	1911	Commandant of Auschwitz & Dora concentration camps.
10.	Baranowski, Hermann		Early commandant of Sachsenhausen concentration camp.
11.	Barbie, Klaus	1913	Gestapo Chief in Lyon, France. Notorious hunter of Jews & resistance movement members.
12.	Barbie, Regine		Wife of Klaus Barbie, nee Wilms/Wilhelms
13.	Barthel, Gustav		Principal assistant of Kajetan Mühlmann

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Figure 21: Extract from SWC List

- (297) The SWC first shared the SWC List with the Swiss government and the Swiss Bankers Association in February 1997, when the SWC sought to determine whether Swiss banks maintained, or had previously maintained, Accounts with SWC Persons.
- (298) AlixPartners received the SWC List from Homburger on September 28, 2021.

7.2 Digitization of name list

- (299) To digitize the scan of the SWC List and extract all data related to the individuals listed in a structured format, we applied a process consistent with the approach used for both the UAG List and Argentine NSDAP List. As such, we first applied OCR followed by manual post-processing activities, such as cleansing of typographical errors and creation of a unique ID for each digitized table row (i.e., for each name from the SWC List).
- (300) In preparation of the Name Matching, we harmonized the spelling of maiden names and adjusted punctuation in names, name structure, and name affixes. In addition, we separated combined maiden and married names into separate Name Variants, and alternative spellings were added for obviously misspelled names.

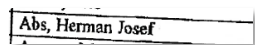
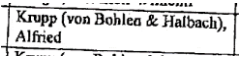
Sample extract from SWC List	Name Variant type	Name Variants used for Name Matching
	Original name as on SWC List	Abs, Herman Josef
	Harmonization of name structure	Abs, Herman
		Abs, Josef
	Alternative for misspelled name	Abs, Hermann Josef
Abs, Hermann		
	Original name as on SWC List	Krupp (von Bohlen & Halbach), Alfried
	Harmonization of spelling	Krupp von Bohlen und Halbach, Alfried
	Harmonization of name structure	Krupp, Alfried
		Von Bohlen, Alfried
		Von Halbach, Alfried
	Alternative known first names	Krupp von Bohlen und Halbach, Alfried
		Krupp von Bohlen und Halbach, Alfried Felix
		Krupp von Bohlen und Halbach, Alfried Alwyn
Krupp von Bohlen und Halbach, Alfried Felix Alwyn		

Table 19: Examples of Name Variants created for SWC Persons

- (301) Following the identification of duplicate entries among the 334 individuals on the SWC List, we identified 311 unique individuals for which 498 Name Variants were created for the Name Matching, as shown in Table 20.

	SWC List
Number of names on lists	334
Number of unique names after de-duplication	311
Number of Name Variants based on unique names	498

Table 20: Number of names on SWC List

7.3 Name matching for the SWC List

- (302) As a result of the Name Matching for the SWC List, the Bank produced structured data for ~84k Hits across the various Data Pools in scope for the SWC List Assessment. After technical de-duplication, ~64k Documents remained, as shown in Table 21 below.

(303) These Documents related to 308 of the 311 unique names on the SWC List. For the other three SWC Persons, no Hit in SAMatching was identified.

	SWC List
Number of Hits	~84k
Number of Documents	~64k
Number of associated SWC Persons	308

Table 21: Overview of Hits on SWC List

7.4 Prof. Jung review of the SWC List

(304) In his research of the SWC Persons in the mid-1990s, Prof. Jung focused on three key questions:

- Who were the clients of SKA that are considered "problematic" due to their involvement in the NS regime?
- Which Banking Relationships were maintained between these "problematic clients" and SKA?
- Based on these Banking Relationships, which conclusions can be drawn with regard to SKA's business strategy in the context of the NS regime?⁹⁴

(305) Prof. Jung applied a multi-step approach to address these questions: First, he compiled a list of parties that held key roles in the NS regime based on, among other things, the SWC List. Second, he compared the names on this list with SKA's client names to identify either "**Name Identity**", for cases in which a Bank client and a SWC Person had the same name, or "**Person Identity**," for cases in which an Account for a SWC Person was identified. Third, he conducted a qualitative analysis of the identified Accounts to identify, among others, type, timing, duration and size of the relationships.⁹⁵

(306) Prof. Jung also leveraged Bank information, in particular documentation collected from the Bank's archives and operating offices, and information identified from public sources. To identify potentially relevant Bank documents, we understand that Prof. Jung shared lists of names with the Bank's archivists and operating offices, who conducted manual searches in available digital archive systems and databases. The results were typically provided as a copy or fax of the original documents.

⁹⁴ Josef Jung, Historische Untersuchung zur Geschichte der Schweizerischen Kreditanstalt (SKA) in den Jahren der NS-Diktatur in Bezug auf die drei Themenbereiche: A: Sperre deutscher Guthaben 1945 und Umsetzung des Washingtoner Abkommens von 1946: Kontextualisierung und Prozessschritte bei der SKA; B: Problematische Beziehungen der SKA mit deutschen Kunden, C: Angebliche Geschäftsbeziehungen der SKA mit Tausenden von argentinischen Kunden mit NS-Hintergrund 1939/45 – Vorwurf des SWC, page 37.

⁹⁵ Josef Jung, Historische Untersuchung zur Geschichte der Schweizerischen Kreditanstalt (SKA) in den Jahren der NS-Diktatur in Bezug auf die drei Themenbereiche: A: Sperre deutscher Guthaben 1945 und Umsetzung des Washingtoner Abkommens von 1946: Kontextualisierung und Prozessschritte bei der SKA; B: Problematische Beziehungen der SKA mit deutschen Kunden, C: Angebliche Geschäftsbeziehungen der SKA mit Tausenden von argentinischen Kunden mit NS-Hintergrund 1939/45 – Vorwurf des SWC, page 38.

- (307) For each SWC Person, Prof. Jung collected identified information in the research binders, referred to as **Prof. Jung Binders**, which summarized his efforts in identifying potential Accounts for the respective SWC Person. As such, the Prof. Jung Binders contained copies of information on the respective individual that Prof. Jung had collected in public sources, copies of search requests placed with the Bank's archives and operating offices, as well as documents received as a result of these requests. Documents contained in the Prof. Jung Binders indicate that, in addition to the Bank's archives, Prof. Jung also sourced data from legal files maintained by the Bank, as well as from the Swiss Clearing Office.
- (308) SWC Persons who Prof. Jung could match without doubt with a Bank client were categorized as "Person Identity". Prof. Jung categorized Banking Relationships for which the name of the Bank client matched the name of the SWC Person but for which it remained unclear whether they were in fact the same person as "**Name Identity**." To differentiate between a "Name Identity" and "Person Identity", Prof. Jung compared criteria such as date and place of birth, date of death, nationality, domicile, occupation, educational background, and other personal information. SWC Persons for whom Prof. Jung could not reach a conclusive observation were grouped in the categories "**Doubtful Person Identity – Person Identity Likely**", "**Doubtful Person Identity – No Definitive Statement Possible**", and "**Doubtful Person Identity – Person Identity Unlikely**". In addition, SWC Persons for whom Prof. Jung identified no match on a Bank document were categorized as "**No Name Identity**."⁹⁶
- (309) We had comprehensive access to the working files and documentation that Prof. Jung created. Given the independent nature of our SWC List Assessment, our reviewers first conducted an independent review in line with the review steps described in *Chapter 7.5* below before mapping our own results with those obtained by Prof. Jung.

7.5 Review Approach for the SWC List

7.5.1 Historical Profiles of SWC Persons

- (310) For SWC Persons, we conducted targeted public research to create a summary of relevant facts related to the respective individual ("**Historical Profile**").
- (311) On a case-by-case basis, our reviewers leveraged public sources to identify key data points related to each SWC Person. The most relevant public sources that we regularly considered for our review included (i) records for NS regime members in the electronic Swiss and German federal archives or provided on the web site of Yad Vashem, (ii) reports of the Claims Resolutions Tribunal of the Holocaust Asset Litigation,⁹⁷ (iii) the websites of the Office of the Historian and the National Archives

⁹⁶ Josef Jung, *Historische Untersuchung zur Geschichte der Schweizerischen Kreditanstalt (SKA) in den Jahren der NS-Diktatur in Bezug auf die drei Themenbereiche: A: Sperrung deutscher Guthaben 1945 und Umsetzung des Washingtoner Abkommens von 1946: Kontextualisierung und Prozessschritte bei der SKA; B: Problematische Beziehungen der SKA mit deutschen Kunden, C: Angebliche Geschäftsbeziehungen der SKA mit Tausenden von argentinischen Kunden mit NS-Hintergrund 1939/45 – Vorwurf des SWC*, page 39ff.

⁹⁷ Claims Resolution Tribunal, Holocaust Victim Asset Litigation, www.crt-ii.org/, (last accessed on March 3, 2023).

and Records Administration in the United States,^{98,99} (iv) genealogical databases such as ancestry.com or familysearch.com, and (v) relevant additional information identified by our research in the internet.

(312) The Historical Profile built on the information available on the SWC List (i.e., year of birth and position held) and typically included the exact date of birth and date of death, names of related individuals, in particular spouses, occupational information, and geographical references. For example, the following information was identified for the individual Walter Schellenberg, for whom we did not identify plausible facts for a Banking Relationship.

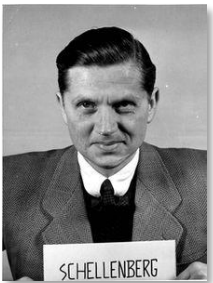
Information from SWC List			
265.	Schellenberg, Walter	1910	Supreme Head of Third Reich espionage services, appointed Chief of Security in occupied territories.
<ul style="list-style-type: none"> Born in 1910 Supreme Head of Nazi Germany espionage services, appointed Chief of Security in occupied territories 			
Selected living circumstance information as identified in public sources: ¹⁰⁰			
<ul style="list-style-type: none"> Full name Walter Friedrich Schellenberg, German national Born on 16 January 1910 in Saarbrücken, Germany, as one of seven children of the piano manufacturer Guido Schellenberg and M. Lydia Riedel In 1920, moved to Luxembourg with his family From 1920s, attended the German universities of Marburg and Bonn to first study medicine, then law In 1933, joined Nazi party and SS In 1934, joined the head office of the Security Service (SS); foreign-intelligence assignment in Paris and subsequent move to Frankfurt In 1937, moved to Italy for a police assignment in 1938, first marriage with Käthe Kortekamp – divorced in 1939 In 1939, organized the creation of the Reich Security Main Office (Reichssicherheitshauptamt) In 1940, second marriage with Irene Grosse-Schönepauck with whom he had five children In 1944, became chief of the merged SS and Wehrmacht intelligence services In 1949, during the Nuremberg Trials, sentenced to prison Released from prison after two years due to health problems Moved to Switzerland before settling in Verbania-Pallanza, Italy Died on 31 March 1952 in Turin, Italy 			

Table 22: Extract of Historical Profile created for Walter Schellenberg

⁹⁸ Department of State United States of America, Office of the Historian, <https://history.state.gov/>, (last accessed on March 3, 2023).

⁹⁹ The U.S. National Archives and Records Administration, <https://www.archives.gov/>, (last accessed on February 28, 2023).

¹⁰⁰ Sources used to compile the Historical Profile of Walter Schellenberg include:

Yad Vashem: The World Holocaust Remembrance Center – Profile Schellenberg, Walter; Ancestry (https://www.ancestry.com/familytree/person/tree/186493323/person/352446709604/facts?_phsrc=fIj31&_phstart=successSource), (last accessed on March 3 2023); Find-A-Grave (<https://www.findagrave.com/memorial/241388220/walter-friedrich-schellenberg>) (last accessed on March 3 2023); and American Intelligence Journal, Profiles in Intelligence: Walter Schellenberg: SD Chief and CIA Report on Walter Friedrich Schellenberg.

7.5.2 Application of Exclusion Criteria and Protection Mechanism

(313) As explained in *Chapter 5.1*, given the fact that we asked the Bank to conduct the Name Matching and produce Documents across all selected Data Pools and without time restrictions, we had to implement processes to identify the Documents in the Review Platform that are potentially relevant to our Investigation and filter out obvious false positive Documents.

(314) To filter out obvious false positive Documents from the pool of ~64k Documents, Documents corresponding to one or both of the following Exclusion Criteria were excluded from further review in the context of the SWC List:

- Documents related to Bank clients where the **date of birth** is different from the date of birth of the respective SWC Person; and
- Documents related to Accounts that were opened at least one year after the **date of death** of the respective SWC Person. For example, a hypothetical Account opened in 1955 for an individual named Walter Schellenberg was filtered out, because the SWC Person Walter Schellenberg died on March 31, 1952; and
- Documents related to Hits from the Data Pools covering **current Account information**.

(315) Under consideration of the Automated Protection Mechanism described in *Chapter 5.3*, the application of the Exclusion Criteria filtered out ~73% of Documents previously identified, i.e., ~47k Documents, as shown in *Table 23* below. Of the Exclusion Criteria listed above, inconsistencies in date of birth information accounted for most exclusions, i.e., ~36k Documents. For one individual, all related Documents were subject to Exclusion Criteria.

(316) As a result, ~17k Documents related to 307 SWC Persons were identified for further review following the Automated Application of Exclusion Criteria (see *Table 23*).

Automated Application of Exclusion Criteria	SWC List	
	Number of Documents	Number of SWC Persons
In scope for application of Exclusion Criteria	~64k	308
Filtered out based on application of Exclusion Criteria	~47k	1
Remaining after application of Exclusion Criteria	~17k	307

Table 23: Number of Documents after Automated Application of Exclusion Criteria for SWC List

7.5.3 First-Level Review

(317) For the ~17k Documents identified for further review, a First-Level Review was conducted on a document content level, as described in *Chapter 5.4*.

(318) As a result, ~1.7k Documents related to 110 SWC Persons were identified as potentially relevant for further review (see *Table 24*).

First-Level Review	SWC List	
	Number of Documents	Number of SWC Persons
In scope	~17.0k	307
Potentially relevant based on First-Level Review	~1.7k	110
Filtered out based on First-Level Review	~14.6k	-8
Not reviewed since Document was irretrievable ¹⁰¹	~0.8k	189

Table 24: First-Level Document Review for SWC List

(319) By contrast, ~14.6k Documents where one or more of the below Exclusion Criteria were identified were filtered out and not processed for further review. The following Exclusion Criteria, which differ from the Exclusion Criteria used for the Argentine Lists, were used in the context of the SWC List:

- Document identified as non-client identifying;
- Not identical first and/or last name(s);
- Different gender;
- Different date of birth; and/or
- Inconsistent living circumstances.

(320) Of the 307 SWC Persons that were in scope for the First-Level Review, for eight Search Persons all related Documents in the First-Level Review were subject to Exclusion Criteria and were not processed for further review.

(321) Approximately 800 Documents could not be identified and retrieved. Because the Documents could not be identified, we were not able to review them and decide whether the Hit was relevant. The results of a comprehensive analyses of these conducted in close alignment with the Bank is described in *Chapter 4.3.4*.

7.5.4 Second-Level Review

(322) For the ~1.7k Documents identified for further review and investigation during the First-Level Review, a Second-Level Review was conducted in close consideration of the Historical Profiles created for the SWC Persons.

(323) As part of this review, all Documents pertaining to the same unique Bank client were consolidated into a Bank Person File that constituted the basis for the Second-Level Review. On a case-by-case basis, our review also included research in CIF Host and the collection of additional publicly available information to validate a Bank Person File.

¹⁰¹ See *Chapter 4.3.4* for details.

- (324) Similar to the review of the Argentine Lists, SWC Persons with a common last name frequently resulted in the identification of several Bank Persons showing a Name Similarity with the respective SWC Person.
- (325) In total, the Second-Level Review of ~1.7k Documents associated with 110 SWC Persons resulted in the creation of 723 Bank Person Files. On average, for each SWC Person we identified approximately seven Bank Persons with Name Similarity.
- (326) Based on a comprehensive assessment of available information, our dedicated team of senior reviewers verified the accuracy and completeness of the results obtained by Prof. Jung and determined whether sufficient plausible facts for an additional Account held by a specific SWC Person were identified.

7.5.5 Identity Investigation

- (327) For all SWC Persons where a Bank Person File in the Second-Level Review was created, an Identity Investigation was performed by dedicated senior reviewers.
- (328) Building on the Historical Profiles created for the SWC Persons, the Identity Investigation identified additional relevant information for both a specific SWC Person and the respective Bank client to provide a comprehensive factual basis for a definitive categorization of our review observation in accordance with our methodology. The Identity Investigation leveraged a variety of internal and external sources, as described in *Chapter 5.6*.
- (329) Based on the additional information collected during the Identity Investigation, the reviewers decided whether sufficient plausible facts for a Banking Relationship have been identified and documented the results in the Review Platform. For all responsive Accounts, the reviewer documented additional identified information on the nature, content, size, and other features of the Accounts.

7.6 Results and validation of Prof. Jung observations

- (330) Our SWC List Assessment confirmed that the eight individuals identified by Prof. Jung for the period between 1933 and 1945 had Accounts. We identified one additional SWC Person who held an Account at SKA that was opened in 1929 and closed in March 1933.

Identification	Account Opening				
	<1933	1933-1938	1939-1945	Unknown, activity <1945	Total (1933-1945)
Prof. Jung & AlixPartners	1	2	2	3	8
AlixPartners only	1	0	0	0	1
Total	2	2	2	2	9

Table 25: Overview of Account opening dates of SWC Persons with plausible facts for a Banking Relationship in the NS Period

(331) For the period after 1945, our SWC List Assessment identified plausible facts for a Banking Relationship with 12 SWC Persons (see *Chapter 8.2*).

7.6.1 Accounts held by SWC Persons between 1933 and 1945

(332) Our SWC List Assessment confirmed that the eight individuals identified by Prof. Jung for the period between 1933 and 1945 had Accounts (see *Table 26*). In the documentation of his research, Prof. Jung grouped these individuals in the category "Person Identity".

(333) We identified one additional SWC Person, a senior manager of a German corporation, who held an Account at SKA that was opened in 1929 and closed in 1933 (Individual S.2 in *Table 26*).¹⁰²

(334) An overview of these Accounts is shown in *Table 26*.

Ind.	Background on Individual	Account Opening Date	Account Closing Date	Prof. Jung Assessment	Available Asset Information and Source ¹⁰³
S.1	German engineer. Not tried at Nuremberg. Exonerated in denazification program.	1923	1990	Person Identity identified	Less than CHF 200,000 in 1948; Swiss Clearing Office
S.2	German executive. Tried at Nuremberg and acquitted.	1929	1933	No Person Identity identified	Not identified
S.3	German industrialist. Indicted at Nuremberg but not tried.	1934	1936	Person Identity identified	Not identified
S.4	Tried at Nuremberg. Convicted and executed.	1935	1935	Person Identity identified	Not identified
S.5	German banker. Not indicted at Nuremberg. Exonerated in denazification program	1936	1994	Person Identity identified	Less than CHF 9 million in 1993; Account statements
S.6	Banker. Acquitted at Nuremberg.	1939	1954	Person Identity identified	Less than CHF 100,000 in 1945; Swiss Clearing Office
S.7	Politician. Acquitted at Nuremberg.	1941	1971	Person Identity identified	Less than CHF 1 million in 1945; Swiss Clearing Office
S.8	German intelligence officer. Witness at Nuremberg.	1945 ¹⁰⁴	1964	Person Identity identified	Not identified
S.9	SS commander. Convicted.	<1945 ¹⁰⁵	Not identified	Person Identity identified	Less than CHF 200 in 1945; Swiss Clearing Office

Table 26: Details on SWC Persons with plausible facts for a Banking Relationship in the NS Period

¹⁰² We identified selected legal entity Accounts for the period 1933 to 1945 that may be related to industrialists named on the SWC List.

¹⁰³ Information may be unrepresentative of the full extent of assets held by the individual, as it only provides a snapshot at a specific point in time. Information shows the highest identified amount.

¹⁰⁴ Date refers to earliest identified banking activity – Account opening date not identified.

¹⁰⁵ The Account opening date could not be identified but according to Prof. Jung's work, the Account was reported in 1945 to the Swiss Clearing Office.

(335) The categorization of the individuals listed in *Table 26* was based on the case-specific rationales described below. For Individuals 1 and 8 included in *Table 26*, our SWC List Assessment identified additional information for personal Accounts not previously found by Prof. Jung:

- Individual S.1: Based on scans of handwritten registry cards, we identified a name match based on a rare last name and first name initial. The Bank Person's titles are consistent with those of the SWC Person. The name of the Bank Person's son was consistent with the name of the SWC Person's son. Both the Bank Person and the SWC Person held a domicile in a village in Austria, among others. In total, three Banking Relationships related to the period between 1923 and 1990 had been identified. Bank documentation indicates that in 1948, assets of less than CHF 200,000 had been cleared by the Swiss Clearing Office. Earliest activity date identified by Prof. Jung dated to 1948, with Prof. Jung's assumption that the Banking Relationship started prior to 1945. The additional Account information identified by us indicates an Account opening in 1923. We also identified an entity Account related to the SWC Person's son.
- Individual S.2: Based on a scan of a single handwritten registry card, we identified an Identical Name Match based on a rare last name. The Bank Person's titles are consistent with those of the SWC Person. The Bank Person held a joint Account – the name of the additional account holder is consistent with the name of the SWC Person's spouse. The Bank Person's domicile is consistent with the identified living circumstances of the SWC Person. Between 1929 and 1933, the Bank Person held a current Account and a fiduciary deposit. No asset information was identified. We identified this case in addition to the results obtained by Prof. Jung.
- Individual S.3: Based on scans of two handwritten registry cards, we identified a name match based on a rare last name and first name initial. The Bank Person's title is consistent with the title of the SWC Person. One of the two Banking Relationships identified referenced a joint account holder whose name is consistent with the name of the SWC Person's spouse. The Bank Person's domicile in Switzerland is consistent with the identified living circumstances of the SWC Person. Between 1934 and 1936, the Bank Person held two current Accounts. A scan of a handwritten list of Bank client names and Account numbers further refers to a Banking Relationship held by a trust in the name of the Bank Person's family. No asset information was identified.
- Individual S.4: Based on a scan of a single handwritten registry card, we identified a Name Similarity based on a rare last name. The Bank Person's title and occupation provided on the registry card are consistent with the identified living circumstances of the SWC Person. The Bank Person and the SWC Person were domiciled in Austria. The Bank Person's foreign currency Account was opened in November 1935 and closed in December 1935. No asset information was identified.
- Individual S.5: Based on scans of typed registry cards, client lists, and a screenshot from CIF Host, we identified a Name Similarity based on a rare last name. The Bank Person's year of birth, as per the Bank's records, is identical with the SWC Person's year of birth. Scans of inheritance documentation, which were identified among the Bank's records, indicate that the name of the

Bank Person's heir is consistent with the name of a related SWC Person. The Bank Person held two Banking Relationships between 1936 and 1994 – as of 1993, one of the Accounts' statements showed assets of less than CHF 9 million. Account statements before 1993 could not be identified. In addition, based on scans of SKA Account opening forms, among others, we identified an Account held by the Bank Person's heir. According to Bank documentation, the heir requested for the Bank Person's assets to be transferred to their Account upon the Bank Person's death in 1994. The heir's Banking Relationship was closed in 2011.

- Individual S.6: Based on scans of typed registry and depot cards, among others, we identified an Identical Name Match. The Bank Person's title and specific occupation information provided on the registry card are consistent with the identified living circumstances of the SWC Person. Between 1939 and 1954, the Bank Person held current and fiduciary Accounts. In 1945, assets of less than CHF 100,000 related to this Bank Person were reported to the Swiss Clearing Office.
- Individual S.7: Based on scans of typed registry and depot cards, among other documents, we identified an Identical Name Match based on a rare last name. The Bank Person's title and specific occupation information provided on the registry card are consistent with the identified living circumstances of the SWC Person. The Bank Person, a German national, was domiciled first in Germany, later abroad – both domiciles are consistent with the SWC Person's living circumstances. Between 1941 and 1971, the Bank Person held a current Account, foreign currency Accounts, and a fiduciary deposit. In 1945, assets of less than CHF 1 million related to this Bank Person were reported to the Swiss Clearing Office.
- Individual S.8: Based on two typed registry cards, we identified an Identical Name Match based on a rare last name. The Bank Person's title provided on both registry cards is consistent with the identified living circumstances of the SWC Person. The Bank Person was domiciled in Switzerland, which is also consistent with the identified living circumstances of the SWC Person. The opening date of the Banking Relationship was not identified – earliest Account activities date to 1945. The Bank Person's current Accounts and a deposit book were closed in 1949, 1963 and 1964, respectively. No asset information was identified. For this Bank Person, Prof. Jung's investigation primarily identified Accounts opened after 1950 and the record of the Account information submission of a safe deposit box to the Swiss Clearing Office in 1945. Our SWC List Assessment identified one Account before 1945 in addition to Prof. Jung's results.
- Individual S.9: Based on records of the Swiss Clearing Office, we identified an Identical Name Match based on a rare last name. The Bank Person's specific occupation information identified in Swiss Clearing Office documentation is consistent with the identified living circumstances of the SWC Person. SKA blocked the Account in February 1945 and reported it to the Swiss Clearing Office in 1947. The documentation referred to assets of less than CHF 200.

7.6.2 SWC Persons without sufficient plausible facts for Banking Relationship

(336) For 290 SWC Persons, we did not identify sufficient plausible facts for a Banking Relationship. This confirms Prof. Jung's results for these individuals.

(337) These 290 individuals comprise 51 individuals for whom we identified insufficient or disconfirming facts, as well as 239 individuals for whom we identified reasonable evidence for person non-identity or no matches:

Observation	Category	Total	
Not sufficient plausible facts for Banking Relationship identified	2A - Match with unspecific facts	0	51
	2B - Match with insufficient facts	29	
	2C - Match with disconfirming facts	22	
	3A - Match with reasonable evidence for person non-identity	38	239
	3B - Automated / manual exclusions	198	
	3C - No name match on any Bank document	3	
Total			290

Table 27: SWC Persons without sufficient plausible facts for a Banking Relationship

**POST-WAR PERIOD
ACCOUNTS**

8 Post-War Period Accounts

(338) While the focus of this Report is on the period 1933 to 1945, we were also asked to process evidence from the period thereafter for further review if we identified relevant information during our Investigation. This was particularly relevant because the data sources we searched were not limited to the NS Period, but also contained data from more recent years. As a result of our investigative approach, we identified Argentine Lists Persons and SWC Persons with plausible facts for Banking Relationships outside the NS Period.

8.1 Accounts held by Argentine Lists Persons after 1945

(339) For the period after 1945, we identified plausible facts for a Banking Relationship for 70 Argentine Lists Persons.

Account Opening			
1946-1949	1950-1959	> 1960	Total (> 1945)
3	24	43	70

Table 28: Overview of SWC Persons with plausible facts for a Banking Relationship for the period after 1945

(340) The 70 identified Accounts for Argentine Lists Persons for the period after 1945 are shown in *Table 29*.

Ind.	List Entry and Date	Account Opening Date	Account Closing Date	Ind.	List Entry and Date	Account Opening Date	Account Closing Date
A.9	UAG (1936)	1948	1957	A.44	NSDAP (1934)	1966	1975
A.10	UAG (1935)	1949	1952	A.45	NSDAP (1934) UAG (1935)	1967	1971
A.11	UAG (1938)	1949	1963	A.46	NSDAP (1937)	1968	1968
A.12	NSDAP (1934)	1950	1980	A.47	NSDAP (1935) UAG (1937)	1968	1973
A.13	NSDAP (1939) UAG (unknown)	1951	1956	A.48	UAG (1940)	1968	1981
A.14	UAG (1934)	1951	1955	A.49	UAG (1940)	1968	1989
A.15	NSDAP (1932)	1951	2019	A.50	UAG (1941)	1969	1996
A.16	UAG (1934)	1952	1961	A.51	UAG (1939)	1971	1984
A.17	UAG (1937)	1952	1965	A.52	(UAG 1938)	1971	1999
A.18	UAG (1935)	1952	1985	A.53	UAG (1927) NSDAP (1934)	1971	2003
A.19	NSDAP (1933) UAG (1937)	1954	1956	A.54	UAG (1940)	1971	2016
A.20	UAG (1939)	1954	1957 ¹⁰⁶	A.55	UAG (1939)	1972	2005
A.21	NSDAP (1934)	1954	1960	A.56	NSDAP (1931) UAG (1935)	1965	1980
A.22	NSDAP (1934)	1954	1974	A.57	UAG (1940)	1973	1994
A.23	UAG (1938)	1955	1956	A.58	UAG (1937)	1973	2013
A.24	UAG (1936)	1955	1956	A.59	UAG (1941)	1974	1978
A.25	UAG (1928) NSDAP (1939)	1955	1956	A.60	UAG (1936)	1974	1997
A.26	UAG (1937)	1955	1957	A.61	UAG (1935)	1976	1986
A.27	UAG (1938)	1952	1959	A.62	NSDAP (1938) UAG (1941)	1976	1998
A.28	UAG (1936)	1955	1968	A.63	UAG (1935)	1976	2002
A.29	UAG (1940)	1955	1982	A.64	UAG (1922) NSDAP (1935)	1977	1986
A.30	UAG (1936)	1956	1958	A.65	UAG (1940)	1978	1984
A.31	NSDAP (1934) UAG (1934)	1956	1967 ¹⁰⁷	A.66	UAG (1933)	1964	1979
A.32	UAG (1941)	1956	1966 ¹⁰⁸	A.67	UAG (unknown)	1964	1979
A.33	UAG (1937)	1958	2006	A.68	NSDAP (1934)	1980	1993
A.34	UAG (1937)	1959	1976	A.69	UAG (1940)	1980	1995
A.35	UAG (1938)	1959	1980	A.70	UAG (1927) NSDAP (1932)	1977	1994
A.36	UAG (1937)	1960	1960	A.71	UAG (1940)	1982	1995
A.37	UAG (1941)	1975	2017	A.72	UAG (1940)	1983	2020
A.38	UAG (1940)	1961	1977	A.73	UAG (1940)	1983	2008
A.39	UAG (1939)	1961	2001	A.74	UAG (1936)	1986	1991
A.40	UAG (1938)	1962	1995	A.75	UAG (1936)	1987	1994
A.41	UAG (1931)	1962	1998	A.76	NSDAP (1937)	1988	2004
A.42	UAG (1937)	1965	1965	A.77	UAG (1941)	1970	2004
A.43	UAG (1938)	1965	1970	A.78	UAG (1937)	2003	2005

Table 29: Details on Argentine Lists Persons with plausible facts for a Banking Relationship for the period after 1945

¹⁰⁶ The last digit of the closing year is not legible.

¹⁰⁷ The last digit of the closing year is not legible.

¹⁰⁸ Date refers to the latest identified banking activity – Account closing date not identified.

8.2 Accounts held by SWC Persons after 1945

(341) For the period after 1945, our SWC List Assessment identified plausible facts for a Banking Relationship for 12 SWC Persons.

Account Opening				
1946-1949	1950-1959	> 1960	Unknown, activity < 1964	Total (>1945)
0	4	6	2	12

Table 30: Overview of SWC Persons with plausible facts for a Banking Relationship for the period after 1945

(342) The 12 identified Accounts for the period after 1945 are shown in Table 31.

Ind.	Background on Individual	Account Opening date	Account Closing date	Available asset information and source ¹⁰⁹
S.10	German businessman. Tried and acquitted.	1950	1975	Not identified
S.11	German scientist. Tried, imprisoned, and released.	1952	1990	Less than CHF 6 million in 1990; Prof. Jung documents
S.12	German engineer. Not tried.	1953	1959	Less than CHF 600,000 in 1958; Handwritten note in Bank documents
S.13	German industrialist. Tried, imprisoned, and released.	1959	Not identified	Not identified
S.14	German chemist. Tried and acquitted.	Not identified	1959	Not identified
S.15	German diplomat. Indicted but not tried.	1961	1964	Not identified
S.16 ¹¹⁰	German industrialist. Imprisoned and released.	1961	1964	Not identified
S.17	German industrialist. Imprisoned and released.	1965	1968	Not identified
S.18	Wife of a Nazi official. Not tried.	1969	1974	Less than CHF 250,000 in 1973/1974; Account statements and Depot Cards
S.19	Nazi commander. Tried, sentenced, and released.	1970	2002	Not identified
S.20	Wife of a Nazi official. Not tried.	1972	2003	Less than CHF 5,000 in 1995; Account statements and Depot Cards
S.21	Nazi commander. Acquitted.	1979	1981	Not identified

Table 31: Details on SWC Persons with plausible facts for a Banking Relationship for the period after 1945

(343) For Individual S.11 included in Table 31, our SWC List Assessment identified selected additional information not previously found by Prof. Jung and vice versa:

¹⁰⁹ Information may be unrepresentative as it only provides a snapshot of a full or partial banking relationship, at a specific point in time. Information shows the highest identified amount.

¹¹⁰ We also identified a legal entity account for this individual.

- Individual S.11: Based on scans of typed registry and client cards, we identified an Identical Name Match based on a rare last name. The Bank Person is a German national domiciled in Germany and Switzerland, which is consistent with the information identified on the SWC Person. The Bank Person's title provided on the Bank documents is consistent with the identified living circumstances of the Search Person. Between 1952 and 1969, the Bank person held current and fiduciary Accounts, as well as a safe deposit box, which were partially identified by Prof. Jung, too. Based on scans of typed registry cards and an extract from the Bank's system, the Bank Person in 1965 further opened a pseudonym Account. These documents were identified by Prof. Jung, in addition to the documents identified in our SWC List Assessment. The assets of the pseudonym Account amounted to less than CHF 6 million in 1990.

QUALITY ASSURANCE

9 Quality Assurance

- (344) To confirm the consistency of key processing and review steps of the Investigation, we implemented continuous quality controls processes and a number of targeted quality assurance measures. These were performed in addition to the ongoing quality measures in the review process (e.g., Automated Protection Mechanism as described in *Chapter 5.3*) and the assessments of relevant Bank processes described in the Investigation Methodology (e.g., walkthroughs and deep dives with the Bank's SAMatching, Image Archive, and Physical Archive experts).
- (345) The most relevant targeted quality assurance measures are described in this Chapter:
- Activities to validate the quality of the review on an ongoing basis (**Ongoing Testing**)
 - Activities to test information completeness for selected sources, including the Bank's physical archives and the repositories related to the work conducted by Arthur Andersen (**Completeness Testing of Sources**)
 - Activities to test the adequacy of the filtering process (**Exclusion and Completeness Testing**)
 - Testing based on relevant individuals related to Argentina and the NS regime identified by our public research for the relevant period (**Individuals of Interest or IOI**) on the Argentine Lists (**IOI Extended Review**)
 - Comparative review of documents previously identified by the historical research of Prof. Jung with our results, to ensure the insights from Prof. Jung's research have been adequately incorporated (**Comparative Review of Prof. Jung Results**)

9.1 Ongoing Testing

9.1.1 Four-Eyes Principle

- (346) The Review Approach described in *Chapter 5* is based on a manual First-Level-Review, the Second-Level Review and the Identity Investigation that was conducted by our team of senior reviewers. Our review management process ensured that the Second-Level Review and subsequent Identity Investigations were conducted by different reviewers than the First-Level Review.
- (347) We had regular quality assurance meetings of the AlixPartners review team to establish consistent standards, ensure clear guidance and discuss new aspects identified by members of the team. The regular quality assurance meetings started with a daily cadence during the initial phase of the Review and were reduced to weekly meetings when the reviewers confirmed sufficient familiarity with the Review Guidelines. New review team members were trained and coached by experienced reviewers. Less senior reviewers reached out to senior team members when they had open questions related to the Review Guidelines.

(348) For the assessment of more complex Search Person and Bank Persons cases during Second-Level Review, each Reviewer had the opportunity to reach out to the Senior Reviewers for the Identity Investigation to get further guidance on additional review required and consistent documentation of the results.

9.1.2 Sample Reviews

(349) As part of our continuous quality controls, Senior Reviewers conducted daily quality assurance reviews on a sample of 1% of Documents reviewed in the First-Level Review for the day. The random sample was automatically generated, and the results were documented in a separate quality assurance review with a dedicated review panel within the Review Platform.

(350) The quality assurance activity based on a daily sample of 1% of Documents reviewed resulted in 19 Documents that were re-categorized by a Senior Reviewer. The Senior Reviewer also provided feedback to the respective First Level Reviewer and the Documents were processed to the Second Level Review.

(351) Of the 19 Documents, 17 Documents relate to Search Persons for which we did not identify sufficient plausible facts for a Banking Relationship. Two Documents relate to Search Persons for which plausible facts for a Banking Relationship were identified. Both Accounts relate to the period after 1945 and have also been identified in the ordinary course of the Investigation's review.

(352) The results of the Sample Reviews were used to further improve our Review Guidelines and to confirm the consistency of the Investigation.

9.2 Completeness Testing of Sources

9.2.1 CCA Testing

(353) As described in *Chapter 3.4.1*, the CCA contains physical documents of the Bank that are inventoried in the archive administration tool ScopeArchive and have been partially scanned and/or indexed in the ImageArchive ZFA or the Image Archive as part of the major digitization efforts of the Bank for relevant historical data sources with Bank client-identifying information in the 1990s.

(354) We conducted targeted sample tests to assess whether the relevant documents within the CCA with client-identifying information have been captured for the relevant period (with a focus of such sample testing on SKA registry cards and Depot Cards prior to 1960) and have been adequately identified during the Investigation. We designed two sample-based tests to address the following topics:

- **Test 1:** For four SKA branches (see *Table 32*) we sample-checked whether the CCA contains relevant Bank client-identifying documents that have not been identified during the Investigation.

- **Test 2:** In the CCA, we sample-tested CDs containing historical SKA and SVB registry cards scanned from Microfilms to validate whether the complete Account information identified on the registry cards stored on these CDs has been covered by SAMatching and has been included in the Investigation.

- (355) Based on six Search Persons for whom we had identified Accounts related to the SKA branches "Hauptsitz", "Basel", "Lugano", and "Davos", we performed on-site Archive testing of the available documents in the CCA archive for these branches.
- (356) We identified the relevant locations of the records for the respective branches in ScopeArchive and visited and searched these archive locations together with the CCA experts. The CCA experts under our guidance reviewed, digitized, and processed the relevant documents containing Bank client-identifying information with a focus on the period 1930 to 1960. The identified documents were then produced to the Investigation Workspace for further review by AlixPartners in relation to the respective Search Person.
- (357) As different branches of the Bank applied different retention rules prior to the centralization of records in the 1990s, the extent of surviving files varied across branches. *Table 32* below illustrates the number of relevant documents identified:

Branch	Number of files loaded into the Review Platform	Additional relevant documents identified
SKA Hauptsitz	69	0
SKA Basel	7,994	0
SKA Lugano	61	0
SKA Davos	1,638	0
Total	9,762	0

Table 32: Overview of observations from CCA Testing

- (358) Within the scope for the sample-based testing, all relevant Bank client-identifying documents retained in the CCA were considered based on our Investigation Methodology.
- (359) For Test 2, we requested an index of the 420 CDs available in the CCA that contain electronic copies of SKA and SVB registry cards.¹¹¹ The index comprised first and last name information of the individuals related to these registry cards.
- (360) Based on the same six Search Persons that had been used in Test 1, we compared the information stored on the CDs with the information identified with our Investigation Methodology. Based on the information contained in the index file of the CDs, we searched in a total of 99 CDs.

¹¹¹ 20 CDs could not be identified by the CCA.

(361) As shown in *Table 33*, all relevant registry cards related to the six Search Persons and identified during our Investigation were also identified on the CDs. No additional relevant registry cards were identified on the CDs.

Total population of CDs in CCA	420
Number of CDs reviewed by AlixPartners	99
Registry cards identified in the Investigation which were not identified on reviewed CDs	0
Registry cards identified on reviewed CDs which were not identified by the Investigation	0

Table 33: Overview of observations from CCA Testing based on CDs

(362) The results of the sample-based completeness tests for the CCA confirmed the consistency of the Investigation.

9.2.2 Testing of the Arthur Andersen Archive

(363) The Arthur Andersen Archive and the associated electronic database on the Arthur Andersen Server constituted relevant data sources for the purpose of the Investigation. In particular, the Arthur Andersen Archive has been used throughout the Identity Investigation as a repository to search for potential additional information.

(364) This section of the Report describes our dedicated quality assurance activities conducted with respect to the physical and electronic repositories created by Arthur Andersen.

(365) To assess the availability and completeness of data and documents on the Arthur Andersen Server and in the Arthur Andersen Archive, we designed three sample-based tests to address the following topics:

- **Test 1:** Sample-based validation to determine whether the Arthur Andersen Server contains the same Bank client names as the Arthur Andersen Archive.
- **Test 2:** Sample-based validation to determine whether selected documents stored in the physical archive folders within the Arthur Andersen Archive are available as imaged documents on the Arthur Andersen Server.
- **Test 3:** Sample-based validation to determine whether selected documents stored on the Arthur Andersen Server are also retained in the Arthur Andersen Archive.

(366) For Test 1, we compared 20 randomly selected pages of the printed name index available in the Arthur Andersen Archive with records on the Arthur Andersen Server. For all the 3,598 names recorded on the 20 pages of the printed name index related to the Arthur Andersen Archive, the respective records on the Arthur Andersen Server were identified.

(367) For Test 2, we compared 34 randomly selected physical archive folders in the Arthur Andersen Archive and compared the different level of information contained in these folders with the information contained on the Arthur Andersen Server.¹¹²

We identified selected cases where the physical archive folder in the Arthur Andersen Archive contained documents that were not stored on the Arthur Andersen Server.

(368) For Test 3, we compared 40 selected Bank client names (criteria-based) and the relevant documents on the Arthur Andersen Server with the information contained in the Arthur Andersen Archive.

(369) For 21 of the 40 of the Bank client names we identified information in the Arthur Andersen Archive. For 20 of the 21 we identified a physical archive folder with documents and in five of these 20 cases, additional documents compared to the available documents on the Arthur Andersen Server could be identified.

(370) The Arthur Andersen Testing confirmed the consistency of the Investigation Approach and supported the following assumptions:

- The Bank client names in the printed name index of the Arthur Andersen Archive are completely contained on the Arthur Andersen Server and have been considered for Name Matching.
- The Arthur Andersen Server contains Bank client names for which no files have been identified in the Arthur Andersen Archive. For Bank client names that have been identified in both the Arthur Andersen Archive and on the Arthur Andersen Server, the Arthur Andersen Archive in some instances contained additional documents.
- Reliable information available on the Arthur Andersen Server for the existence of physical archive folders for Bank client names in the Arthur Andersen Archive can be used to improve efficiency of the Investigation, given the capacity and time intensity of manual search in the Arthur Andersen Archive.
- The Arthur Andersen Archive may contain additional documents in the physical archive folders for a specific Bank client name compared to the Arthur Andersen Server. Therefore, we decided to perform additional reviews in the Arthur Andersen Archive for relevant Bank client names on the Arthur Andersen Server to assess whether additional relevant documents exist in the available physical archive folders.

(371) The results of the Arthur Andersen Testing were used to further improve our review process, as described, and confirmed the consistency of the Investigation.

¹¹² The selection included Bank client folders from the different Arthur Andersen review categories.

9.3 Exclusion and Completeness Testing

- (372) As set forth in *Chapter 5.1*, Documents that were responsive to an Exclusion Criteria were filtered out from further review. We conducted targeted quality assurance activities to assess the adequacy of the criteria-based filtering of Documents. This quality assurance review was documented in a dedicated review panel in the Review Platform.
- (373) We defined a risk-based sample of ~7k Documents meeting the following criteria:
- Documents that were identified for Search Persons included on both the UAG List and the Argentine NSDAP List; and
 - Documents with a Name Matching score >94% or Identical Name Match based on the Manual Review of Name-Combinations; and
 - Documents that were responsive to an Exclusion Criterion, e.g., non-SKA, out of scope legal entity, non-client identifying, or out of scope domicile and/or nationality.
- (374) A manual quality assurance review was performed to assess the adequacy of the criteria-based exclusion on a Document-by-Document basis. In addition to the Document-specific exclusion criterion, quality assurance reviewers conducted a comprehensive assessment of each Document based on parameters similar to those used in the First-Level Review (e.g., assessment of name match type, domicile and nationality, as well as Account timeline and legal entity) to allow further analysis of the quality assurance results.
- (375) Of 7,046 Documents in scope for the Exclusion and Completeness Testing, quality assurance reviews confirmed the exclusion of 6,942 Documents, i.e., 98.5% of the testing population. For 104 Documents, additional quality assurance reviews were conducted to ensure consistent handling of the Documents. As shown in *Table 34*, the majority of these Documents had previously been excluded due to the Bank client's domicile as identified on the Document having been considered out of scope, either based on the Automated Application of Exclusion Criteria or based on manual First-Level Review.

	Document Exclusion confirmed	Document Exclusion not confirmed
Number of Documents	6,942 (98.5%)	104 (1.5%)
Document Exclusion Criterion		
Automated Application of Exclusion Criteria		
Non-SKA legal entity	4,279	0
Out of scope domicile	496	48
Out of scope nationality	8	0
Account held by legal entity	1	0
Manual First-Level Review Exclusion		
Out of scope domicile	1,468	25
Non-SKA legal entity	288	2
Not client identifying	250	24
Not identical first and/or last names	132	4
Out of scope nationality	8	0
Account held by legal entity	7	0
Different gender	5	1
Total	6,942 (98.5%)	104 (1.5%)

Table 34: Result overview for the Exclusion and Completeness Testing review

(376) For the 104 Documents identified above, an additional quality assurance review was conducted with the following outcome:

- For 68 of the 104 Documents, the Document Exclusion was confirmed due to an out-of-scope domicile.
- For 16 of the 104 Documents other relevant Exclusion Criteria confirmed the Document exclusion, e.g., out of scope nationality or Accounts held by a legal entity.
- 20 of the 104 Documents (0.3% of the testing population) were further reviewed and were not relevant for a change in categorization of a Search Person, as shown in *Table 35*:

Documents in scope of additional quality assurance review	104 (1.5%)
Document Exclusion confirmed based on out-of-scope domicile	68
Document Exclusion confirmed based on other Exclusion Criteria	16
Documents further reviewed	20 (0.3%)
Documents relevant for a change in the categorization of a Search Person	0

Table 35: Results of the additional quality assurance review relating to Document Exclusions

(377) The results of the Exclusion and Completeness Testing were used to incorporate the additional identified Documents and to confirm the consistency of the Investigation Approach.

9.4 Individuals of Interest Testing

- (378) We conducted an extended review for relevant individuals related to Argentina and the NS regime identified by our public research for the relevant period on the Argentine Lists ("**IOI Testing**") to assess the consistency of the Investigation Approach for the Argentine Lists.
- (379) The identification of the Individuals of Interests was based on public research to identify individuals with political, commercial, industrial, military, or financial influence and links to the NS regime and or holding key roles for the NS regime in Argentina during the NS Period – irrespective of the names included on the Argentine Lists. Individuals identified based on such research to be linked to Argentina and the NS regime were matched with the Argentine Lists. We compiled the list of Individuals of Interest for the IOI Testing by matching the results of our public research with the Argentine Lists (25 IOIs) and supplemented with a small number of additional IOIs identified during our review (3 IOIs). The List with the names of the 28 IOIs is set forth in Annex 2 at Credit Suisse in Switzerland.
- (380) In total, we identified 28 IOIs for the purpose of our quality assurance. These individuals included, among others, senior executives of leading German companies, media personalities, and German diplomats with ties to Argentina and the NS regime, as well as identified leaders in the NS regime in Argentina.
- (381) The IOI Extended Review for the 28 IOIs was designed as a completeness check across the identified Documents of these Search Persons and included additional Archive Research Requests for expanded searches.
- (382) Overall, the IOI Extended Review was performed on ~11k Documents as additional quality assurance to assess the consistency of the categorization of all Bank Persons that had previously been identified for the 28 Search Persons.
- (383) As shown in *Table 36*, the IOI Testing confirmed the Investigation's results for 27 IOIs. For one IOI, the IOI Testing identified additional information that resulted in the identification of plausible facts for a Banking Relationship for this Search Person:

Individuals in scope of IOI Testing based on Investigation result		IOI Testing result	
		Categorization confirmed	Update of Search Person categorization
Sufficient plausible facts for a Banking Relationship identified	2	2	0
Not sufficient plausible facts for a Banking Relationship identified	26	25	1
Total	28	28	

Table 36: Overview of observations from IOI Testing

- (384) For one IOI, our quality assurance process revealed information that resulted in the identification of plausible facts for a Banking Relationship.¹¹³
- (385) A scan of a handwritten, poorly legible registry card was the sole Document identified for this Search Person. Due to a mismatch of the spelling of the last name identified in the Document's metadata, it had been excluded in line with our Review Guidelines. We re-assessed the Document in the IOI Testing, leveraging the extensive living circumstances information for this Search Person that had been compiled during our review.

As a result, the name of a joint account holder, as shown on the Document, was identified as consistent with the name of the Search Person's spouse, and the Bank Person's South American domicile was found to be consistent with the Search Person's living circumstances. While poorly legible, an Identical Name Match was identified based on the Document's image.

- (386) The results of the IOI Testing were used to incorporate the additional Document and to confirm the consistency of the Investigation Approach.

9.5 Comparative Review of Prof. Jung Results

- (387) As part of the independent SWC List Assessment, for purposes of assessing the accuracy and completeness of the results of the prior historical research into the SWC List conducted by Prof. Jung in 1997, we carried out two dedicated quality assurance procedures (i) to validate the completeness of Documents identified by AlixPartners during the Investigation compared to the documents identified by Prof. Jung, and (ii) to validate the consistency and completeness of the Investigation with a focus on Documents subject to Exclusion Criteria:

- **Test 1:** Sample-based comparison of relevant files within the working papers of Prof. Jung ("**Prof. Jung Reference Document**") with Documents identified in our Investigation ("**Investigation Reference Documents**") to assess the accuracy and completeness of our Investigation methodology.
- **Test 2:** Sample-based assessment of adequacy of Document filtering based on Exclusion Criteria.

¹¹³ This individual is also included as Individual A.7 in *Chapter 6.5.1*.

(388) To validate the consistency of the Investigation, Test 1 addressed the following topics:

- Sample-based assessment on whether the Investigation identified any Documents that were not identified by Prof. Jung; and
- Sample-based assessment on whether the Documents identified by Prof. Jung have also been identified in the Investigation.

(389) These quality assurance activities were based on the review of 929 Documents identified for a sample of 54 Search Persons. Based on a side-by-side comparison of Investigation Reference Documents and Prof. Jung Reference Documents, we made the following observations:

- We identified 155 Documents that were part of the AlixPartners Reference Documents, but not part of the Prof. Jung Reference Documents. We recognize that the search technology used for the Investigation evolved compared to when Prof. Jung carried out his research in 1997.

As a result of our quality assurance processes, we identified two additional Search Persons with sufficient plausible facts for a Banking Relationship after 1960.

- We identified 276 Documents that were part of the Prof. Jung Reference Documents but had not been identified as an Investigation Reference Document based on the Investigation Methodology. All 276 Documents had still been included in the Review Platform based on the Investigation's consideration of Prof. Jung Reference Documents. Accordingly, there was no impact on the categorization of any of the related Search Persons.

(390) The results obtained from the sample population covered by Test 1 show that our Investigation, based on its comprehensive use of a variety of repositories and data sources, covered all relevant Prof. Jung Reference Documents.

(391) To verify the adequacy of Document filtering based on the Exclusion Criteria, Test 2 comprised a sample-based review of 1,918 Documents related to 131 Search Persons. The Sample was based on filtered out Documents for Search Persons that had been categorized by Prof. Jung as "Doubtful Person Identity", "Name Identity", and "No Name Identity" in line with the categorization logic applied during his review.

(392) Based on a manual quality assurance review, the exclusion of 1,917 Documents was confirmed. One Document had been otherwise excluded from the Investigation based on a deviation in the last name, and this Document was recategorized and incorporated in our review.

The recategorization of the Document resulted in a change in the categorization of the related Search Person based on the Document but we did not identify sufficient plausible facts for a Banking Relationship.¹¹⁴

- (393) The results of the Comparative Review of Prof. Jung Results confirmed the consistency of the Investigation Approach.

¹¹⁴ The Search Person was previously categorized as "3B Automated/ Manual Exclusions" and is now categorized as "2C – Match with disconfirming facts"

